

**Reid Collins & Tsai LLP**

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*Special Litigation Counsel to Plaintiff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE NORTHWEST COMPANY, LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 7

Case No. 20-10990 (MEW)

(Jointly Administered)

**SUMMARY SHEET PURSUANT TO UNITED STATES TRUSTEE  
GUIDELINES FOR REVIEWING APPLICATIONS FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES  
UNDER 11 U.S.C. §330 FOR FINAL FEE APPLICATION  
OF REID COLLINS & TSAI LLP, AS SPECIAL COUNSEL  
TO TRUSTEE IN CONNECTION ADVERSARY CASE**

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<sup>1</sup> The Debtors in these Chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, are: The Northwest Company, LLC (8132) and The Northwest.com LLC (1339). This application relates only to The Northwest Company LLC. Any reference to Debtors, means both debtors, and any reference to Debtor means only The Northwest Company LLC.

<b>NAME OF APPLICANT:</b>	Reid Collins & Tsai LLP	
<b>CURRENT COMPENSATION FEE PERIOD:</b>	12/1/2021 through 4/26/2023	
<b>ROLE IN THE CASE:</b>	Special Counsel to Yann Geron, Chapter 7 Trustee of the Estate of Thelen LLP	
<b>CURRENT APPLICATION:</b>	<b>Requested</b>	<b>Previously Awarded</b>
<b>Total Fees for the Current Period:</b>	\$769,260.00	None
<b>20% Holdback Fees from Prior Period</b>	\$106,737.50	None
<b>TOTAL Fees for Compensation</b>	\$875,997.50	None
<b>Total Expenses for the Current Period</b>	\$22,429.26	
<b>20% Holdback Expenses from Prior Period</b>	\$583.18	
<b>TOTAL APPLICATION AMOUNT</b>	<b>\$899,009.94</b>	
<b>PRIOR APPLICATION PAID – SEEK FINAL APPROVAL</b>	<b>\$429,282.73</b>	<b>\$429,282.73</b>
<b>TOTAL FEES AND EXPENSES IN CASE</b>	<b>\$1,328,292.67</b>	<b>\$429,282.73</b>

**ACTUAL HOURS BILLED (PRIOR Application period)**

<b>NAME OF PROFESSIONAL OR PARA-PROFESSIONAL</b>	<b>TITLE</b>	<b>YEAR ADMITTED</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Angela J. Somers	Partner	1987	\$875	413.5	\$361,812.50
Jeffrey Gross	Partner		\$875	5.3	\$4,637.50
Vince Novelli	Associate		\$575	114.3	\$65,722.50
Dylan Jones	Associate		\$575	165.2	\$94,990.00
Jodie Wingerter	Paralegal	N/A	\$250	18.5	\$4,625.00
Laurie Sadler	Paralegal	N/A	\$250	7.6	\$1,900.00
<b>TOTALS</b>				<b>724.4</b>	<b>533,687.50</b>

**PRIOR APPLICATION PERIOD**

<b>TITLE</b>	<b>BLENDED RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Partners	\$875	418.8	\$366,450.00
Associates	\$575	279.50	\$160,712.50
Sub-Total for Attorneys	\$754.92	698.3	\$527,162.50
Paraprofessionals	\$250	26.1	\$ 6,525.00
<b>TOTALS</b>	<b>736.73</b>	<b>724.4</b>	<b>\$533,687.50</b>

<b>ACTUAL HOURS BILLED (Current Application Period)</b>					<b>CURRENT APPLICATION PERIOD</b>
<b>NAME OF PROFESSIONAL OR PARA- PROFESSIONAL</b>	<b>TITLE</b>	<b>YEAR ADMITTED</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Angela J. Somers	Partner	1987	\$875	669.9	\$586,162.50
Jeffrey Gross	Partner		\$875	6.2	\$5,425.00
Vince Novelli	Associate		\$575		
Dylan Jones	Associate		\$575	36.7	\$21,102.50
Dylan Jones	Associate		\$675	209.4	\$141,345.00
Jodie Wingerter	Paralegal	N/A	\$250	60.9	\$15,225.00
Laurie Sadler	Paralegal	N/A	\$250		
<b>TOTALS</b>				<b>983.1</b>	<b>\$769,260.00</b>

#### **CURRENT APPLICATION PERIOD**

<b>TITLE</b>	<b>BLENDED RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Partners	\$875.00	676.1	\$591,587.50
Associates	\$660.09	246.1	\$162,447.50
Sub-Total for Attorneys	\$817.65	922.2	\$754,035.00
Paraprofessionals	\$250.00	60.9	\$15,225.00
<b>TOTALS</b>	<b>\$782.48</b>	<b>983.1</b>	<b>\$769,260.00</b>

<b>ACTUAL HOURS BILLED (Combined Application Periods)</b>					<b>COMBINED APPLICATION PERIODS</b>
<b>NAME OF PROFESSIONAL OR PARA- PROFESSIONAL</b>	<b>TITLE</b>	<b>YEAR ADMITTED</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Angela J. Somers	Partner	1987	\$875	1083.4	\$947,975.00
Jeffrey Gross	Partner		\$875	11.5	\$10,062.50
Vince Novelli	Associate		\$575	114.3	\$65,722.50
Dylan Jones	Associate		\$575	201.9	\$116,092.50
Dylan Jones	Associate		\$675	209.4	\$141,345.00
Jodie Wingerter	Paralegal	N/A	\$250	79.4	\$19,850.00
Laurie Sadler	Paralegal	N/A	\$250	7.6	\$1,900.00
<b>TOTALS</b>				<b>1707.5</b>	<b>\$1,302,947.50</b>

#### **COMBINED APPLICATION PERIODS**

<b>TITLE</b>	<b>BLENDED RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
Partners	\$875.00	1094.9	\$958,037.50
Associates	\$614.84	525.6	\$323,160.00
Sub-Total for Attorneys	\$790.62	1620.5	\$1,281,197.50
Paraprofessionals	\$250.00	87	\$21,750.00
<b>TOTALS</b>	\$763.07	<b>1707.5</b>	<b>\$1,302,947.50</b>

**Reid Collins & Tsai LLP**

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*Special Litigation Counsel to Plaintiff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE NORTHWEST COMPANY, LLC, *et al.*<sup>2</sup>  
Debtors.

Chapter 7

Case No. 20-10990 (MEW)

(Jointly Administered)

**FINAL APPLICATION OF REID COLLINS & TSAI LLP, AS SPECIAL COUNSEL  
TO TRUSTEE IN CONNECTION WITH ADVERSARY CASE FOR ALLOWANCE OF  
COMPENSATION FOR SERVICE AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
MAY 1, 2021, THROUGH APRIL 26, 2023**

TO THE HONORABLE MICHAEL E. WILES, UNITED STATES BANKRUPTCY JUDGE:

Reid Collins & Tsai LLP (“**Reid Collins**”), special counsel to Yann Geron (“**Trustee**”), the chapter 7 trustee of The Northwest Company LLC (the “**Debtor**” or “**Northwest**”), in connection with the adversary proceeding captioned *Yann Geron as chapter 7 Trustee of the Northwest Company LLC v. Extreme Horse Limited and Northwest Textile LLC* (adv. pro. no. 20-01082) (the “**Adversary Case**”), pursuant to sections 330(a) and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 2016 of the Federal Rules of Bankruptcy

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<sup>2</sup> The Debtors in these Chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number, are: The Northwest Company, LLC (8132) and The Northwest.com LLC (1339).

Procedures (the “**Bankruptcy Rules**”), applies for a final allowance of compensation for services rendered and reimbursement of expenses for the period of May 1, 2021 through April 26, 2023 (the “**Application**”) and represents as follows:

### **Introduction**

1. On April 18, 2020 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 11 the Bankruptcy Code. [Main ECF 1] On May 4, 2020, the Debtor commenced the Adversary Case. [Adv. ECF 1].

2. On November 20, 2020 (the “**Conversion Date**”), the Debtors’ cases were converted to cases under chapter 7 of the Bankruptcy Code. [Main ECF 385]. On November 23, 2020, Yann Geron was appointed chapter 7 trustee of the Debtors’ estates and is currently serving in that capacity.

3. By order dated May 21, 2021, the Trustee was authorized to retain Reid Collins to represent him in the Adversary Case. [Main ECF 460]. Reid Collins is compensated at their standard hourly rates plus expenses. Reid Collins commenced work on the case on May 1, 2021.

4. The Trustee was substituted in as plaintiff in the Adversary Case on May 25, 2021. [Adv ECF 10].

5. During the period of May 1, 2021 through April 26, 2023, Reid Collins represented the Trustee as plaintiff in the Adversary Case and discharged its duties at the highest professional standards.

6. Reid Collins has charged the Trustee for its services at customary rates that are comparable to rates charged by practitioners with similar insolvency/litigation expertise, skill and experience. Reid Collins does not make a profit on any reimbursement of expenses.

7. Reid Collins previously submitted a *First Interim Application of Reid Collins & Tsai LLP, as Special Counsel to Trustee in Connection with Adversary Case for Allowance of Compensation for Services and Reimbursement of Expenses for the Period May 1, 2021 through November 30, 2023* (“**First Fee Application**”) in the amount of \$426,950.00 in fees and \$2,332.73 in expenses [ECF 604] (not including the 20% holdback amounts).

**Summary of Relief Requested**

8. This Application is respectfully submitted by Reid Collins for (a) final allowance of compensation for services rendered during the current fee period (12/1/2021-4/26/2023) (“**Current Fee Period**”) in the amount of **\$769,260** in fees and **\$22,429.26** in expenses (not including fees of an expert which are paid directly by the Trustee); (b) payment of the holdback amount for fees from the prior fee period (5/1/2021-11/30-2021) (“**Prior Fee Period**”) in the amount of **\$106,737.50** and **\$583.18** in expenses heldback; and (c) final approval of amounts previously paid for fees in the Prior Fee Period in the amount of **\$426.950.00** (\$533,687.50 minus 20% holdback), plus reimbursement of expenses in the amount of **\$2,332.73** (\$2,915.91 minus 20% holdback). In the Current Fee Period, Reid Collins expended a total of **983.1 hours** of professional and paraprofessional time. During the Prior Fee Period, Reid Collins expended a total of **724 hours** of professional and paraprofessional time. Total hours spent were **1707.5 hours**.

9. Reid Collins has not sought fees for the drafting or approval of this fee application, but it reserves its rights to apply for such fees in the event that the fee application process involves further services on the part of Reid Collins.

10. Copies of the detailed attorney time records for the Current and Prior Fee Periods as well as itemized expenses are annexed hereto as Exhibit A.

**Summary of Services Rendered by Reid Collins During the Current Fee Period**

11. The time spent by Reid Collins during the Current Fee Period was generally devoted to: (a) reviewing large amounts of discovery produced from different sources and deposition transcripts, and other evidentiary support for the claims; (b) participating in a mediation with Defendants, Extreme Horse Limited (“**Extreme Horse**”) and Northwest Textile Holding LLC (“**Northwest Textile**”); (c) settling the case against Extreme Horse, finalizing the settlement agreement, obtaining court approval of the settlement, including responding to objections, in addition to follow up regarding sale of various properties and payment of settlement consideration; (d) responding to a motion to dismiss of Northwest Textile and arguing same; (e) establishing a case management order, serving requests for production and admission and preparing for and taking depositions, and responding to requests; (f) coordinating with Trustee’s accountants on numerous financial issues; (g) coordinating with experts on the scope of opinion and drafting of expert reports; and (h) coordinating with co-counsel regarding a global settlement of the claims against Northwest Textile, among other things ((a) through (g) above “**Legal Work**”). The activities Reid Collins engaged in for the Prior Fee Period were set forth in the First Fee Application.

**The Instant Application - Compensation Sought**

12. The time devoted to the Legal Work by the professionals and paraprofessionals employed by Reid Collins in its capacity as special counsel to the Trustee for the Current Fee Period is detailed in the time sheets which are annexed hereto as Exhibit A.

13. The total amount of fees and expenses outstanding and sought by Reid Collins in its capacity as special counsel to Trustee for the Current Fee Period is summarized as follows:

Total Fees Requested:	<b>\$875,997.50</b>
Total Expenses Requested:	<b>\$23,012.44</b>
Total Fees and Expenses Requested:	<b>\$899,009.94</b>



14. During the Current Fee Period, Reid Collins committed **983.1 hours** of professional and paraprofessional time resulting in an average hourly billing rate of **\$782.48** on actual billings. Reid Collins seeks payment of fees reflecting this time in the amount of **\$769,260**. Reid Collins requests final approval and payment of these fees.

15. During the Prior Fee Period, Reid Collins committed a total of **724.4 hours** of professional and paraprofessional time, resulting in an average hourly billing rate of **\$736.73** on actual billings. Reid Collins was not paid the holdback amount of fees (20%) relating to this time in the amount of **\$106,737.50**. Reid Collins requests final approval and payment of these fees that were subject to a hold back.

16. Reid Collins was paid 80% of fees for the Prior Fee Period in the amount of **\$426,950.00** and requests final approval of these fees. No payment of these fees is necessary as they were previously paid by the estate.

17. Also, during the Current Fee Period, Reid Collins advanced **\$22,429.26** of expenses (excluding expert fees which are paid directly by the Trustee) for which the Trustee seeks final approval and reimbursement. The disbursements made by Reid Collins were actually incurred, and Reid Collins believes them to be reasonable in amount.

18. During the Prior Fee Period, Reid Collins incurred **\$2,915.91** of expenses of which \$583.18 (20% holdback) were not paid. Reid Collins requests final approval of these expenses from the Prior Fee Period and payment of the **\$583.18** held back.

19. Reid Collins was paid 80% of expenses for the Prior Fee Period in the amount of \$2,332.73 and requests final approval of these fees. No payment of these expenses is necessary as they were previously paid by the estate.

20. Reid Collins' attorneys have represented and continue to represent chapter 7 and 11, and liquidating trustees in numerous bankruptcy litigation cases under the various chapters of the Bankruptcy Code. Reid Collins also represents liquidators in chapter 15 cases as well as receivers in federal receiverships. Reid Collins and its members enjoy a reputation as experts in this field and in the handling of insolvency related litigation.

21. Reid Collins provided distinguished services as a team of professionals in the insolvency/litigation area. It provided the Trustee with the specialty services and expertise necessary to adequately represent and protect the Trustee and the estate's interests. The Trustee settled the adversary proceeding against both defendants resulting in a substantial recovery for the estate. Therefore, Reid Collins services also contributed to a substantial net recovery to the Debtor's estate.

22. In light of the services rendered and the complexities of this case, Reid Collins submits that the fees being sought are reasonable and will in no way result in a windfall to Reid Collins. With the Trustee's support, Reid Collins thus seeks to have its awarded fees and expenses paid from the funds currently in the Debtor's estate.

23. Finally, in compliance with Bankruptcy Rule 2016(a), Reid Collins states that no payments have been made or promised to Applicant for services rendered or to be rendered in any capacity in connection with this case, other than as stated in this Application. No agreement or understanding exists between Applicant and any other person for the sharing of compensation to be received for services rendered in connection with this case.

24. Reid Collins also seeks reimbursement for research costs and other related expenses, and to the extent applicable, it does not request more than 10 cents per page for photocopies. Reid Collins does not seek any reimbursement for overtime expenses, cabs for overtime work or meals. Reid Collins does not make a profit on any reimbursement of expenses.

### **Notice**

25. Notice of the fees sought by this Application will be given in accordance with this Court's order limiting scope of notice, which was entered on February 24, 2010, prior to a hearing for approval of Reid Collins fees. Additionally, full copies of this Application and Exhibits have been provided to counsel of the United States Trustee, and any party that requests it.

26. Reid Collins respectfully requests that such notice be deemed fair and adequate notice of the instant Application.

### **No Prior Relief**

27. Except as specifically set forth at length above, no prior application for the relief sought herein has been made to this or any other court.

### **CONCLUSION**

For all the foregoing reasons, Reid Collins respectfully requests:

(i) final allowance of compensation for services rendered by Reid Collins as special counsel to the Trustee during the Current Fee Period and the Prior Fee Period representing fees and expenses in the total amount of **\$1,328,292.67;**

(ii) payment of fees not previously paid as fees of the Current Fee Period and fees subject to a holdback from the Prior Fee Period in the total amount of **\$875,997.50.**

(iii) payment of expenses not previously paid as expenses of the Current Fee Period and expenses subject to a holdback from the Prior Fee Period in the total amount of **\$23,012.44;**

(iv) such other and further relief as is just and proper.

Dated: June 6, 2023

REID COLLINS & TSAI LLP

/s/Angela J. Somers

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*Special Litigation Counsel for Plaintiff*

# EXHIBIT A

**Please Remit to:**  
**Reid Collins & Tsai LLP**  
**1301 S Capital of Texas Hwy**  
**Building C, Suite 300**  
**Austin, Texas 78746**  
**Main: 512.647.6100**  
**Fax: 512.647.6129**

Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

6/14/2021

**Invoice No.:**

6631

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
5/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
5/1/2021	AJS	Review Extreme Horse action, answer, underlying agreements and related Florida action; review docket to get familiar with the case, review discovery done in main bankruptcy case relating to adversary and adversary docket (3.2); emails to client (.6); review depositions (.8) draft Summary of actions (.7); call with V. Novelli re: same (.3).	5.6	875.00	4,900.00
5/3/2021	AJS	Further review of documents and analysis and continue to review pleadings in docket (2.9); call with V. Novelli re: same (.2).	3.1	875.00	2,712.50
5/4/2021	AJS	Analyze and draft email to client re: answer and amendment (1.2); email to client re: Eisneramper analysis review requests for examiner and other pleadings; call with V. Novelli re: same (.3).	1.5	875.00	1,312.50
5/4/2021	VAN	Review and analyze adversary pleading complaint and answer, docket and pretrial orders, Florida pleadings, and Northwest/Extreme Horse agreements.	2.6	575.00	1,495.00
5/5/2021	AJS	Review CBIZ report (.7); prepare for and discuss action with client and follow up (1.1); call with V. Novelli re: same (.4); work on revised complaint (1.3).	3.5	875.00	3,062.50
5/5/2021	VAN	Review CBIZ report and request for examiner (.8); call with client and follow up call with A. Somers (1.5).	2.3	575.00	1,322.50
5/6/2021	VAN	Legal research and drafting amended adversary complaint.	2.7	575.00	1,552.50



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Tax ID No. 27-1333576

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Yann Geron, Chapter 7 Trustee of  
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Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
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Billing Through	Due Date:	Our File #
5/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
5/7/2021	AJS	Analyze issues relating to claim splitting for application in adversary and elsewhere (1.4).	1.4	875.00	1,225.00
5/10/2021	AJS	Work on action and documents available to support the claim (1.6); emails with M. Egan re: same (.3); call with V. Novelli re: same (.3).	2.2	875.00	1,925.00
5/10/2021	VAN	Review Auerbach and Dong Mei deposition transcripts and CBIZ report and draft amended adversary complaint (7.6); call with A. Somers re: same (.3).	7.9	575.00	4,542.50
5/13/2021	AJS	Speak to M. Egan re: documents and draft summary regarding same to send to client (1.7); call with V. Novelli re: same (.2).	1.9	875.00	1,662.50
5/13/2021	VAN	Call with M. Egan re: document collection and analysis and follow up call with A. Somers and draft summary of same.	1.5	575.00	862.50
5/14/2021	AJS	Review emails from M. Egan (.9); work on revised complaint (1.3).	2.2	875.00	1,925.00
5/18/2021	AJS	Draft letter re: strategy for court and adversary re: Extreme Horse action (.7).	0.7	875.00	612.50
5/19/2021	AJS	Review docket to ascertain discovery (.5); prepare for and attend call with client to propose strategy for adversary proceeding and follow up with V. Novelli (.8).	1.3	875.00	1,137.50
5/19/2021	VAN	Strategy call with client and follow up call with A. Somers.	0.5	575.00	287.50
5/20/2021	AJS	Call regarding case with client, N. Santucci, V. Novelli and adversary; and follow up call with V. Novelli (1.2).	1.2	875.00	1,050.00



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Yann Geron, Chapter 7 Trustee of  
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370 Lexington Avenue, Suite 1101  
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6/14/2021

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5/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
5/20/2021	VAN	Call with client and Extreme Horse counsel and follow up call with A. Somers (1.3); draft proposed order adjourning pretrial dates (.2).	1.5	575.00	862.50
5/21/2021	VAN	Legal research in support of amended complaint.	1.4	575.00	805.00
5/24/2021	VAN	Finalize and file letter to court and proposed adjournment order.	0.3	575.00	172.50
		TOTAL PROFESSIONAL FEES			33,427.50
		REIMBURSABLE EXPENSE			
5/31/2021	VAN	Westlaw Inv 844468109 - May 2021		16.27	16.27
		TOTAL REIMBURSABLE EXPENSES:			16.27

**Total**

\$33,443.77



# reid | collins

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Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

8/16/2021

**Invoice No.:**

6712

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
7/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
7/6/2021	AJS	Email to N. Santucci re: search of produced documents and review documents re: same. (1.3).	1.3	875.00	1,137.50
7/7/2021	AJS	Review email chain and emails to M. Egan and N. Santucci re: search of produced documents and Sills documents (.6). Review Alvarez and Marsal report; draft emails to Sills and review documents. (1.2).	1.8	875.00	1,575.00
7/8/2021	AJS	Email with N. Santucci re: call to Sills (.2); review email to Jason Teele re: questions and answers and call with same (.3); emails with M. Egan re: Textile produced documents and review documents (.3); review documents and work on draft complaint (1.4).	2.2	875.00	1,925.00
7/9/2021	AJS	Review email from Y. Geron re: Auerbach agreement re: privileged documents and respond (.2).	0.2	875.00	175.00
7/12/2021	AJS	Emails and calls to V. Novelli re: NW case documents and complaint (.5); emails to and from M. Egan re: Alvarez report and documents (.3); email to J. Teele re: conversation (.2); email with J. Teele re: documents (.1); review arrangement with Todd Duffy re: privileged emails and respond and make comments (.5); review documents and work on draft complaint (.9)	2.5	875.00	2,187.50
7/13/2021	AJS	Lengthy email to Y. Geron re: several important issues and work on all those issues (1.2); review documents work on draft complaint (.8).	2	875.00	1,750.00



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6712

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
7/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/14/2021	AJS	Work on complaint and emails with M. Egan re: same (1.7); call with M. Egan re: Textile Transfer; review documents sent by M. Egan (.5); numerous review of email from M. Egan re: Textile and review CIT Agreements and bank statements re: same; work on complaint (2.2).	4.4	875.00	3,850.00
7/15/2021	AJS	Review documents received from M. Egan (.4); email to Y. Geron and N. Santucci about complaint and constructive fraud (.3); review email from V. Novelli re: Extreme Horse reply (.5); draft email to M. Egan re: same re date of Agreements execution, and review response; revise complaint (2.1).	3.3	875.00	2,887.50
7/15/2021	VAN	Revise amended complaint including legal research and review of produced documents for use in same.	4.9	575.00	2,817.50
7/16/2021	AJS	Emails with M. Egan re: documents and Itochu and Shay Auerbach and emails with V. Novelli re: same (1.1); work on draft complaint (1.5).	2.6	875.00	2,275.00
7/16/2021	VAN	Revise amended complaint and review Sills Cumis production for use in complaint and exchange emails with A. Somers about same.	4	575.00	2,300.00
7/19/2021	AJS	Send draft complaint to M. Egan for comments and review and discuss same; review email from Y. Geron re: Auerbach settlement (.3); emails with M. Egan re: operating agreement and other issues (.4); emails with V. Novelli re: discovery and work on draft complaint (1.1).	1.8	875.00	1,575.00
7/19/2021	VAN	Review Ashford production for use in amended complaint.	1.8	575.00	1,035.00



**Please Remit to:**  
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**Austin, Texas 78746**  
**Main: 512.647.6100**  
**Fax: 512.647.6129**

Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

8/16/2021

**Invoice No.:**

6712

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
7/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/20/2021	AJS	Review choice of law; review financial condition of NW and constructive fraud (2.1); review overall production for status conference and email from M. Egan (.4); craft approach and email to M. Egan and Y. Geron re: proposed handling of status conference; (.8) review email from adversary re: same and strategize for response (.2); call with V. Novelli and M. Egan re: hosting documents and follow up (.6).	4.1	875.00	3,587.50
7/20/2021	VAN	Review Ashford production for use in amended complaint (4); correspond with potential document vendor (.5); call with Eisner Amner to discuss document hosting and preparation for same (.7); legal research in support of amended complaint (.6).	5.8	575.00	3,335.00
7/21/2021	AJS	Review stipulation re: Auerbach documents (.5); emails with M. Egan and N. Santucci re: documents; review documents selected by V. Novelli re: Ashford production and work on complaint (2.2).	2.7	875.00	2,362.50
7/21/2021	VAN	Finish reviewing Ashford production (.3); correspond with document vendor and Y. Geron re: document hosting (.3).	0.6	575.00	345.00
7/22/2021	AJS	Review emails from M. Egan re: facts and documents and further work on complaint issues (.8). Cred work on claims (7.0).	7.8	875.00	6,825.00
7/23/2021	AJS	Emails from Y. Geron re: Ross Auerbach and consider privilege issues (.5).	0.5	875.00	437.50
7/26/2021	AJS	Prepare for status conference; send recitation to M. Egan for accuracy re: document production (1.9).	1.9	875.00	1,662.50
7/26/2021	VAN	Call with A. Somers in preparation for hearing.	0.3	575.00	172.50



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Billing Through	Due Date:	Our File #
7/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/27/2021	AJS	Prepare for and attend status conference (.9).	0.9	875.00	787.50
7/27/2021	VAN	Prepare for and attend hearing.	0.8	575.00	460.00
TOTAL PROFESSIONAL FEES					45,465.00
REIMBURSABLE COSTS					
6/30/2021	VAN	Westlaw Inv 844633786 - June 2021		264.43	264.43
7/27/2021	AAD	Court Solutions: Status Conference - Yann Geron (1 of 2)		70.00	70.00
7/27/2021	AAD	Court Solutions: Status Conference - Yann Geron (2 of 2)		70.00	70.00
7/31/2021	VAN	Westlaw Inv 844793796 - July 2021		74.09	74.09
TOTAL REIMBURSABLE COSTS:					478.52
INVOICE TOTAL					45,943.52
Previous Invoice 6631 Balance					33,443.77

**Total Balance Due** \$79,387.29

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**Invoice Date:**

10/8/2021

**Invoice No.:**

6747

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
9/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
8/5/2021	AJS	Review documents including LLC Agreement (1.1).	1.1	875.00	962.50
8/10/2021	AJS	Review email from M. Egan re: solvency of NW at time of transfer (.5); emails with J. Litos and N. Santucci re: documents and follow-up on same (.8).	1.3	875.00	1,137.50
8/20/2021	AJS	Email to Y. Geron re: putting document on document management system (0.2).	0.2	875.00	175.00
8/23/2021	AJS	Work on complaint and facts (2.2).	2.2	875.00	1,925.00
8/24/2021	AJS	Call with N. Santucci, M. Egan and V. Novelli and follow-up (.9); work on complaint facts (.9).	1.8	875.00	1,575.00
8/24/2021	VAN	Call with Trustee to discuss case strategy (.7).	0.7	575.00	402.50
9/2/2021	VAN	Work with vendor to prepare for data hosting and provide Trustee with materials for application to court (1.3).	1.3	575.00	747.50
9/6/2021	AJS	Review email from K. Aulet and consider same (.2).	0.2	875.00	175.00
9/7/2021	VAN	Legal research in support of complaint and discuss same with A. Somers (.8).	0.8	575.00	460.00
9/8/2021	AJS	Work on other document production issues, search terms for Clear thinking documents and email and call with M. Egan re: same (1.7); start motion to amend (2.2); work on complaint (1.1).	5	875.00	4,375.00
9/8/2021	VAN	Draft search terms to facilitate document review (2.2).	2.2	575.00	1,265.00

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9/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
9/8/2021	VAN	Call with vendor concerning document hosting and review and follow up correspondence about same (.8).	0.8	575.00	460.00
9/9/2021	AJS	Review documents (1.1); work on motion to amend (.3); work on complaint (.8).	2.2	875.00	1,925.00
9/10/2021	AJS	Work on complaint and fact review (3.3).	3.3	875.00	2,887.50
9/13/2021	AJS	Emails re: production and upload and review documents of Auerbach and review documents pulled by V. Novelli and emails with same re: same (3.2); revise complaint (2.9).	6.1	875.00	5,337.50
9/14/2021	VAN	Analyze debtors' documents for use in complaint (6.5).	6.5	575.00	3,737.50
9/15/2021	AJS	Review new documents and work on complaint in light of same (3.5).	3.5	875.00	3,062.50
9/16/2021	AJS	Emails with M. Egan verifying facts (.9); review new documents and work on complaint in light of same (2.9).	3.8	875.00	3,325.00
9/16/2021	VAN	Review and organize information from prior deposition (.2); correspond with document hosting vendor (.1)	0.3	575.00	172.50
9/16/2021	LAS	Review deposition transcript of Pan Dong Mei and organize specific excerpts from deposition (2).	2	250.00	500.00
9/17/2021	AJS	Emails with M. Egan verifying facts, including CIT (.9); review new documents and work on complaint in light of same (3.2).	4.1	875.00	3,587.50
9/17/2021	VAN	Analyze debtors documents including CIT agreement for use in complaint (2.6).	2.6	575.00	1,495.00

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Date	Timekeeper	Description	Hours	Rate	Fee
9/20/2021	AJS	Review documents uploaded from Ashford/Auerbach, work on complaint (1.6); supervise and tend to document transfer and upload (.2); work on complaint (3.6); emails with Trustee re: call with Ashford (.1); several communications with V. Novelli re: factual and legal issues re: the complaint (.7); communications with M. Egan re: various factual issues (.9); draft Motion to Amend (2.8).	9.9	875.00	8,662.50
9/20/2021	VAN	Discuss factual and procedural issues surrounding amended complaint with A. Somers and D. Jones (1).	1	575.00	575.00
9/20/2021	DEJ	Discuss background factual and procedural issues with V. Novelli (.3).	0.3	575.00	172.50
9/21/2021	AJS	Review documents uploaded from Ashford/Auerbach (2.1); supervise and tend to document transfer and upload (.2); work on complaint (3.6); emails with Trustee re: call with Ashford (.1); several communications with V. Novelli re: factual and legal issues re: the complaint (.7); communications with M. Egan re: various factual issues (.9).	7.6	875.00	6,650.00
9/21/2021	VAN	Legal research for use in motion for leave to amend and discuss same with A. Somers (4.4); draft motion for leave to amend (3.3)	7.7	575.00	4,427.50
9/21/2021	DEJ	Review draft amended complaint (1).	1	575.00	575.00

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9/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
9/22/2021	AJS	Review documents uploaded from Clear Thinking (2.5); review email from J. Litos re: production (.1); investigate current and future creditor emails with M. Egan re: same (.8); review emails from K. Aulet and consider response (.2); work on complaint (3.2); draft email re: Ashford call (.2); email with G. Schwegmann re: fraudulent transfer issues (.3); communications with M. Egan re: various other factual issues, including Itochu for complaint (.4).	7.7	875.00	6,737.50
9/22/2021	VAN	Review debtors' documents for use in complaint and conduct legal research in support of same and communications with A. Somers (7.7).	7.7	575.00	4,427.50
9/23/2021	AJS	Review documents uploaded from Clear Thinking (1.7); make diagram for complaint and verify contents (.5); several communications with M. Egan re: various other factual issues for complaint, including CIT (.6); several communications with V. Novelli re: factual and legal issues re: the complaint (.8); work on complaint (3.6).	7.2	875.00	6,300.00
9/23/2021	VAN	Call with Ashford (.3); review debtors' documents and conduct legal research in support of complaint, including calls with A. Somers to discuss same (6.6)	6.9	575.00	3,967.50
9/23/2021	LAS	Organize conference call with the Court for hearing (.4); review docket and research case and court rules (1.2); draft Notice of Motion to Amend the Complaint and Add Additional Parties (.4); interoffice communications with counsel regarding Hearing and Amended Complaint (.3).	2.3	250.00	575.00



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9/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
9/24/2021	AJS	Review documents uploaded from Clear Thinking (1.7); make diagram for complaint and verify contents (.5); several communications with M. Egan re: various other factual issues for complaint, including financial status of entities (.8); several communications with V. Novelli re: factual and legal issues re: the complaint (.7); work on complaint (4.3).	8	875.00	7,000.00
9/24/2021	VAN	Draft and edit motion for leave to amend and complaint and discuss same with A. Somers (5.6).	5.6	575.00	3,220.00
9/24/2021	JLW	Preparation of company structure diagram for insertion into amended complaint; receive and review email from V. Novelli and A. Somers regarding same (.6).	0.6	250.00	150.00
9/27/2021	AJS	Several emails and calls with M. Egan re: many factual issues (1.3); emails with N. Santucci re: complaint and objections to claims (.3); review documents (1.1); several communications with V. Novelli re: factual and legal issues re: the complaint (1.5); work on complaint and Motion to Amend (4.6).	8.8	875.00	7,700.00
9/27/2021	VAN	Review and revise complaint and work with A. Somers on same (4); review debtors' documents in support of complaint (1.5)	5.5	575.00	3,162.50
9/27/2021	JLW	Review and revise company structure diagram for insertion into amended complaint; telephone conference with A. Somers regarding same (.8).	0.8	250.00	200.00
9/28/2021	AJS	Prepare for and attend status conference (1.5); work on complaint and Motion to Amend (5.1); several emails and calls with M. Egan re: many factual issues (.9); review documents (1.3); several communications with V. Novelli re: factual and legal issues re: the complaint (.8).	9.6	875.00	8,400.00



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**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
9/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
9/28/2021	VAN	Prepare for and attend court conference (1.5) review and revise complaint, including legal research and discussions with A. Somers concerning same (4.6)	6.1	575.00	3,507.50
9/28/2021	DEJ	Proofread draft amended complaint, propose changes to same (1.7).	1.7	575.00	977.50
9/29/2021	AJS	Work on complaint and Motion to Amend (4.8); several emails and calls with M. Egan re: many factual issues (1.1); several communications with V. Novelli re: factual and legal issues re: the complaint (1.6); prepare and send complaint and Motion to Amend to K. Aulet at Brown Rudnick (.3).	7.8	875.00	6,825.00
9/29/2021	VAN	Draft complaint and motion for leave to amend including legal research, and discuss same with A. Somers (3.5).	3.5	575.00	2,012.50
9/29/2021	DEJ	Proofread draft motion for leave to amend, propose edits to same (1.1).	1.1	575.00	632.50
9/29/2021	JLW	Review and revise amended complaint; receive and review email from V. Novelli regarding same (.5)	0.5	250.00	125.00
9/30/2021	AJS	Review deposition transcripts for complaint (1.4); email with adversary (.2); numerous emails with V. Novelli re: complaint and work on complaint (7.2).	8.8	875.00	7,700.00
9/30/2021	VAN	Review and edit complaint and motion for leave to amend (5.2).	5.2	575.00	2,990.00
9/30/2021	LAS	Review Amended Complaint and Motion and cite check (.8).	0.8	250.00	200.00

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9/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
9/30/2021	JLW	Review and revise amended complaint (0.8); draft and revise proposed order granting motion for leave to file amended complaint (0.4); receive and review email from V. Novelli regarding same (0.1).	1.3	250.00	325.00
		TOTAL PROFESSIONAL FEES			138,500.00
		REIMBURSABLE COSTS			
7/31/2021	AJS	Westlaw Inv 844793796 - July 2021		50.33	50.33
9/28/2021	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
9/28/2021	VAN	Court Solutions - Teleconference: V. Novelli		70.00	70.00
9/30/2021	GEN	Westlaw Inv 845119035 - September 2021		765.42	765.42
		TOTAL REIMBURSABLE COSTS:			955.75
		INVOICE TOTAL			138,843.25
		Invoice 6631 dated 6/14/2021			33,443.77
		Invoice 6712 dated 8/16/2021			45,943.52

**Balance Due**

\$218,230.54



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370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

12/2/2021

**Invoice No.:**

6795

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
11/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
10/1/2021	AJS	Finalize motion to amend and First Amended Complaint (6.2).	6.2	875.00	5,425.00
10/1/2021	VAN	Finalize and file complaint and motion for leave to amend	11	575.00	6,325.00
10/1/2021	DEJ	Proofread draft notice of motion for leave to amend (0.3); cross-check and update table of contents and table of authorities in motion for leave to amend (0.9).	1.2	575.00	690.00
10/1/2021	LAS	Review notice and motion to amend and organize exhibits to same. File all with the Court.	1	250.00	250.00
10/4/2021	AJS	Email from T. Duffy re: Motion to Amend (.1); consider same and right of Textile to participate (.4); email re: use of documents and same and review email from D. Jones re: same with cases (1.6).	2.1	875.00	1,837.50
10/4/2021	DEJ	Research re: standing to object to leave to amend.	0.9	575.00	517.50
10/5/2021	AJS	Send and review email from client re: extension and use of documents and work on claims (2.7).	2.7	875.00	2,362.50
10/5/2021	DEJ	Draft and file notices of appearance for D. Jones, V. Novelli, and A. Somers.	1.5	575.00	862.50
10/6/2021	AJS	Review email from client re: extension and use of documents and work on same (.5).	0.5	875.00	437.50
10/6/2021	LAS	Review and retrieve case information from the Florida 11th Judicial Circuit Court and advise counsel of same.	0.3	250.00	75.00

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12/2/2021

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**RE: Adversary Proceeding**

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11/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
10/11/2021	AJS	Work on cost of data base issue in an effort to reduce costs, including emails with J. Holmes (.4); tend to adjournment issues and right to object re: new adversary (.8); work with J. Gross on reducing document management system costs; review documents re: clear thinking selection; call with M. Egan re: same (.4); work on running extra searches and discuss eliminating documents from Platinum to reduce costs (1.8); work on proof on underlying claims (.7).	4.1	875.00	3,587.50
10/12/2021	AJS	Review Notice of Appearance of D. Jones and revise same; call with M. Egan re: documents and document review additional documents; discuss near-lining document with J. Gross and email to Platinum re: same. (3.2); work on proof on underlying claims (.9).	4.1	875.00	3,587.50
10/12/2021	LAS	Interoffice communications regarding notice of appearance of D. Jones.(0.2); review and finalize notice of appearance of D. Jones and file same with the Court.(0.2); interoffice communications regarding notice of appearance of A. Somers (0.2); review and finalize notice of appearance of A. Somers and file same with the Court (0.2); interoffice communications regarding notice of appearance of V. Novelli.(0.2); review and finalize notice of appearance of V. Novelli and file same with the Court (0.2).	1.2	250.00	300.00
10/13/2021	AJS	Review Notice of Appearance of D. Jones and revise same (.3); call with M. Egan re: documents and document review additional documents; discuss near-lining document with J Gross and email to Platinum re: same. (2.2); work on proof on underlying claims (.9).	3.4	875.00	2,975.00



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11/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
10/14/2021	AJS	Review Notice of Appearance of D. Jones and revise same; call with M. Egan re: documents and review additional documents; discuss near-lining document with J. Gross and email to Platinum re: same. (3.2); work on proof on underlying claims (.9).	4.1	875.00	3,587.50
10/15/2021	AJS	Consider impact of facts in complaint and jurisdiction (1.5); emails to M Egan and D. Jones re: same (.2).	1.7	875.00	1,487.50
10/18/2021	AJS	Consider impact of facts in complaint and jurisdiction (.4).	0.4	875.00	350.00
10/18/2021	DEJ	Prepare summons and related documents for service of amended complaint on Textile.	2	575.00	1,150.00
10/20/2021	AJS	Email to client about creditors committee documents (.3) and continue work on claims (1.7).	2	875.00	1,750.00
10/21/2021	AJS	Review emails from M. Egan re: additional issues in adversary and hosting costs; work on claims (2.8).	2.8	875.00	2,450.00
10/22/2021	AJS	Speak to Platinum, consider alternatives and draft email to client about management of document system costs (1.1); review emails sent by M. Egan; work on claims (2.3).	3.4	875.00	2,975.00
10/25/2021	JEG	Call w/ A. Somers about potential strategy.	0.2	875.00	175.00
10/25/2021	AJS	Email with client and reach out to former creditors committee counsel for document and review email and pleadings re: same (.5); review Florida action and prejudgment attachment possibilities and email with J. Wingerter re: same (1.5); review evidence to prepare discovery proposal in reply emails and calls with D. Jones re: same and call with J. Gross (2.6).	4.6	875.00	4,025.00



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Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

12/2/2021

**Invoice No.:**

6795

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
11/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
10/25/2021	DEJ	Review amended complaint and current discovery to identify areas needing further discovery.	3.7	575.00	2,127.50
10/26/2021	JEG	Calls and emails about potential strategy.	0.4	875.00	350.00
10/26/2021	AJS	Review Objection and prepare to reply and emails and calls with D. Jones re: same (7.3); investigate ability to obtain prejudgment attachment re: Extreme Horse Florida assets (.3); emails with former creditors' committee counsel re: documents (.2); consider summary judgment motion against Extreme Horse; calls and emails with J. Gross re: above (.3); emails to D. Jones re: evidence and further discovery (.2).	8.3	875.00	7,262.50
10/26/2021	DEJ	Review applicable local rules and calendar date for reply ISO leave to amend (0.5); review and catalogue evidence produced to date and identify additional discovery needed (3.0); legal research re: imputation of bad faith to Trustee (2.3); Conference call with A. Somers and M. Egan re document production (0.4).	6.2	575.00	3,565.00
10/27/2021	AJS	Review Objection and prepare to reply review and work on discovery needs for same emails and calls with D. Jones (8.2).	8.2	875.00	7,175.00
10/27/2021	DEJ	Legal research re: bad faith in seeking leave to amend and prejudice in leave to amend after discovery, draft and revise summary of same (2.4); draft and revise reply in support of motion for leave to amend (4.6).	7	575.00	4,025.00
10/28/2021	JEG	Call w/ A. Somers about motion to amend.	0.3	875.00	262.50



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10/28/2021	AJS	Review Objection and prepare to reply review and work on discovery needs for same emails and calls with D. Jones and call with J. Gross (7.4).	7.4	875.00	6,475.00
10/28/2021	DEJ	Review and revise reply in support of motion for leave to amend (4.0); cite check reply in support of motion for leave to amend (2.8); research re delay in seeking leave to amend can be imputed to trustee (2.8)	9.6	575.00	5,520.00
10/29/2021	JEG	Review reply brief for motion for leave to amend and discuss w/ A. Somers.	0.5	875.00	437.50
10/29/2021	AJS	Review Objection and prepare to reply; review and work on discovery needs for same emails and calls with D. Jones and call with J. Gross (6.1).	6.1	875.00	5,337.50
10/29/2021	DEJ	Attention to filing reply in support of motion for leave to amend, review and revise reply, finalize reply and coordinate filing.	6.8	575.00	3,910.00
10/29/2021	JLW	Finalize and file reply in opposition to response to motion for leave to file amended complaint. (.20); receive and review email from D. Jones regarding same (.10).	0.3	250.00	75.00
10/30/2021	AJS	Prepare for hearing and work related to amending complaint (3.2).	3.2	875.00	2,800.00
11/1/2021	JEG	Review proposed discovery plan and emails re: same.	0.2	875.00	175.00



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11/1/2021	AJS	Review email re: creditors committee data base and further consideration of same (.3); emails with M. Egan re: Jianxin deposition (.2); email to K. Aulet re: discovery relating to amendment and review email back.; draft email about limiting discovery, send to J. Gross for view. Prepare for hearing on motion to amend (6.8).	7.3	875.00	6,387.50
11/1/2021	DEJ	Call with A. Somers re: additional discovery needed to prove fraudulent transfer claim.	0.2	575.00	115.00
11/2/2021	JEG	Call w/ A. Somers about motion for leave to amend.	0.3	875.00	262.50
11/2/2021	AJS	Review email re: creditors committee data base (.2); emails with Y. Geron re: settlement in response to EH inquiry and damage claim and follow up on same (.7); prepare for and attend call with K. Aulet re: possible settlement; (.5); brief research burden of proof and review email from D. Jones re: same; (.5); review D. Jones email re: evidence and variety of issues and cases re: same(1.1); review cases and prepare for hearing and call with J. Gross (5.6).	8.6	875.00	7,525.00
11/2/2021	DEJ	Legal research re: burden of proof for fraudulent transfer claims (1.5); legal research re: availability of prejudgment attachment (0.9); legal research re: getting Pan Dong Mei's emails into evidence (1.1); review key documents and evaluate addition discovery necessary (1.3); review outline for argument on motion for leave to amend (0.4).	5.2	575.00	2,990.00
11/2/2021	JLW	Pull and save to Sharepoint all cases cited in reply to objection to motion for leave to amend complaint (.50); receive and review email from A. Somers regarding same (.10).	0.6	250.00	150.00



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Date	Timekeeper	Description	Hours	Rate	Fee
11/3/2021	AJS	Attend hearing and follow up work with order and discovery schedule and serving summons and emails with D. Jones re: same and emails with adversary re: same (6.5); review D. Jones email re: attachment (1.8).	8.3	875.00	7,262.50
11/3/2021	DEJ	Research for A. Somers re: standard for bad faith in requesting leave to amend (0.5); attend telephonic hearing on motion for leave to amend (0.4); outline steps to get subsequent summons and serve Northwest Textile with amended complaint (0.7); legal research re: prejudgment attachment and factual research re: Extreme Horse assets (3.7); draft email to Trustee re: moving for attachment (0.6).	5.9	575.00	3,392.50
11/4/2021	JEG	Call w/ A. Somers about strategy.	0.2	875.00	175.00
11/4/2021	AJS	Email to client re: prejudgment attachment and activities of EH and work on same; and long email to client re: same and damages (4.3); email review re: creditor committee documents (.1); review retention and email to client re: Morrison Cohen retention (.2); follow up on motion to amend order and email from adversary re: same (2.8); prepare draft email to Judge Wiles re: disagreement on order and call with J. Gross (.5).	7.9	875.00	6,912.50
11/4/2021	DEJ	Review opposing counsel's modifications to proposed joint pre-trial order (0.4); review and revise email to Trustee re: risk of attachment (0.2); legal research re: damages where attachment order overturned, draft and revise summary of same for A. Somers (1.0); review and catalogue key documents for inclusion in joint pretrial order (1.9).	3.5	575.00	2,012.50
11/5/2021	JEG	Call w/ A. Somers about pretrial order.	0.2	875.00	175.00

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11/5/2021	AJS	Emails with adversary about JPTO to be submitted as part of motion to amend and send same to court and call with J. Gross (2.1).	2.1	875.00	1,837.50
11/5/2021	DEJ	Review and revise proposed joint pre-trial order, review opposing counsel's modifications to proposed joint pre-trial order, calls with A. Somers re: same.	1.4	575.00	805.00
11/8/2021	AJS	Work on JPTO and emails with D. Jones and adversary re: same (1.8); email with client re: attachment motion and work on attachment motion and call with adversary re: same (7.7).	9.5	875.00	8,312.50
11/8/2021	DEJ	Draft and revise motion for prejudgment attachment and affirmation in support (5.5); legal research re: same, calls with A. Somers re: same (3.5); call with opposing counsel re: request for relief (0.5).	9.5	575.00	5,462.50
11/8/2021	JLW	Draft and revise notice of motion for prejudgment attachment, memorandum of law in support of motion for prejudgment attachment, A. Somers' affirmation in support of motion for prejudgment attachment (1.10); receive and review email from D. Jones regarding same (.10).	1.2	250.00	300.00
11/9/2021	JEG	Review draft motion for attachment and calls and emails about the motion.	1.5	875.00	1,312.50

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11/9/2021	AJS	Emails with client re: attachment (.3); work on attachment motion and calls and emails and calls with D. Jones and M. Egan re: same and call with J. Gross (8.2); consider aid and abet in context and review D. Jones email (.3); call with adversary re: attachment (.1); emails with creditors committee re: documents (.1); emails with court and adversary re: hearing on OSC (.1).	9.1	875.00	7,962.50
11/9/2021	DEJ	Attention to filing motion for prejudgment attachment, review and finalize motion, affirmation in support, and exhibits (7.0); calls with A. Somers re: same; call with opposing counsel re: request for relief (0.4).	7.4	575.00	4,255.00
11/9/2021	JLW	Research FL lawsuit regarding order for mediation (.20); receive and review email from D. Jones regarding same (.10); preparation of exhibits to A. Somers' affirmation in support of motion for prejudgment attachment (1.10); update motion for prejudgment attachment with citations and prepare table of authorities (.90); finalize and file motion for prejudgment attachment, declaration, supporting exhibits, and proposed order (1.40); upload proposed order to show cause to ECF (.10); telephone conference with A. Somers regarding same (.10).	3.9	250.00	975.00
11/10/2021	JEG	Call w/ A. Somers about attachment hearing	0.3	875.00	262.50
11/10/2021	AJS	Prepare for work on attachment hearing and attend order to show cause hearing and follow up call with client and work on form of order and review adversary email re: same and call with J. Gross (3.9); work on jurisdiction point raised by court and review email from D. Jones re: same. (.4); prepare for objection to attachment (2.7); work on JPTO (.7).	7.7	875.00	6,737.50



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11/10/2021	DEJ	Research re: capping damages for wrongful attachment (1.1); telephone calls and emails with A. Somers re: hearing prep (0.7); attend hearing on order to show cause (0.9); draft and revise reply ISO attachment and legal research related to same (4.8); file amended complaint and request for subsequent summons (0.4).	7.2	575.00	4,140.00
11/10/2021	JLW	Preparation for hearing and telephone conference with courtroom deputy regarding filing of proposed order to show cause.	0.9	250.00	225.00
11/11/2021	JEG	Review cases on evidentiary issues at pretrial hearings and emails w/ A. Somers about attachment hearing.	0.4	875.00	350.00
11/11/2021	AJS	Address service of summons (.2); prepare for attachment hearing with evidence and address other issue and calls and emails with D. Jones and M. Egan re: same and call with J. Gross (5.2).	5.4	875.00	4,725.00
11/11/2021	DEJ	Coordinate service of Textile by counsel and registered agent (0.7); research Extreme Horse US assets, draft and revise outline re: issues for attachment of out-of-state property (2.0); draft and revise declarations of M. Egan and D. Jones ISO attachment and reply ISO attachment (5.5).	8.2	575.00	4,715.00
11/12/2021	AJS	Prepare supplemental declaration and prepare for attachment hearing and for receipt of objection and emails and calls with D. Jones and M. Egan re: same (8.3).	8.3	875.00	7,262.50
11/12/2021	DEJ	Review and revise reply and supporting declarations ISO attachment, legal research re: same.	9.2	575.00	5,290.00



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11/12/2021	JLW	Receive and review summons issued to Northwest Textile and save to Sharepoint (.10); update calendar and Court Sense regarding setting of pretrial conference (.20); update calendar regarding deadline for Northwest Textile to file a motion or answer amended complaint (.10); update adversary pleading file with all filed pleadings (.50); preparation of complaint and summons for service via USPS on Northwest Textile Holding's agent for service of process and US Trustee's office (.40); receive and review email from D. Jones regarding same (.10)	1.4	250.00	350.00
11/13/2021	AJS	Work on reply to objection to attachment order and emails and calls with D. Jones and M. Egan re: same (5.6).	5.6	875.00	4,900.00
11/13/2021	DEJ	Attention to filing reply ISO attachment and supporting declarations (2.5); call with opposing counsel re: joint pretrial order (0.3).	2.8	575.00	1,610.00
11/13/2021	JLW	Review and revise reply to opposition to motion for attachment with table of contents and table of authorities (1.10); receive and review email from D. Jones regarding same (.10); download and circulate Defendants' opposition to motion for attachment (.10).	1.3	250.00	325.00
11/14/2021	AJS	Work on reply to objection to attachment order and emails and calls with D. Jones and M. Egan re: same.	7.1	875.00	6,212.50
11/14/2021	JLW	Finalize and file reply in support of motion for order of pre-judgment attachment (.80); receive and review email from D. Jones regarding same (.10).	0.9	250.00	225.00

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11/15/2021	AJS	Prepare for and attend hearing on attachment and follow up on same for order and emails and calls with D. Jones and M. Egan re: same and with adversary and emails with client re: same (8.4).	8.4	875.00	7,350.00
11/15/2021	DEJ	Phone calls and emails with A. Somers re: motion for attachment and legal research re: same (1.8); attend hearing on motion for attachment (1.3); draft and revise proposed order of attachment/injunction, incorporate comments from A. Somers re: same (2.5).	5.6	575.00	3,220.00
11/16/2021	JEG	Emails w/ A. Somers about attachment.	0.2	875.00	175.00
11/16/2021	AJS	Follow up on attachment order and emails and calls with D. Jones re: same and with adversary and emails with client re: same and emails with J. Gross re: same and call with J. Gross (2.1); work on JPTO and emails and calls with D. Jones and M. Egan re: same (3.3).	5.4	875.00	4,725.00
11/16/2021	DEJ	Research re: enforcing order of attachment, calls with US Marshal's office re same (1.5); incorporate further comments from A. Somers into proposed order of attachment (0.8).	2.3	575.00	1,322.50
11/17/2021	AJS	Work on JPTO and emails and calls with D. Jones and M. Egan re: same, including stipulated facts (7.8); review emails from D. Jones and J. Wingerter re: summons (.2).	8	875.00	7,000.00
11/17/2021	DEJ	Research re: Textile answer and possible constructive fraudulent transfer claims (2.2); calls with A. Somers re: joint pretrial order, draft and revise same (5.5).	7.7	575.00	4,427.50



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11/18/2021	AJS	Work on JPTO and emails and calls with D. Jones and M. Egan re: same including stipulated facts and deposition (7.3); reply to Chambers inquiry re: attachment order (.2).	7.5	875.00	6,562.50
11/18/2021	DEJ	Emails and calls with A. Somers re: exhibit and witness lists (2.1); review and revise joint pretrial order and exhibit list (4.1).	6.2	575.00	3,565.00
11/18/2021	JLW	Contact court reporter regarding status of hearing transcript and email to A. Somers regarding same (.10); research database for emails contained within Extreme Horse's document production (1.40); receive and review email from A. Somers regarding same (.10).	1.6	250.00	400.00
11/19/2021	AJS	Review transcript of attachment order and work on same and calls and emails with D. Jones re: same and email to adversary, court and client re: same (2.3); work on JPTO (6.2).	8.5	875.00	7,437.50
11/19/2021	DEJ	Attention to joint pretrial order, collect and organize proposed trial exhibits.	8.5	575.00	4,887.50
11/20/2021	AJS	Review and prepare exhibits for trial and work on JPTO calls and emails with D. Jones re: same (5.1).	5.1	875.00	4,462.50
11/21/2021	JEG	Calls w/ A. Somers about pretrial order.	0.4	875.00	350.00
11/21/2021	AJS	Review and prepare exhibits for trial and work on JPTO and calls and emails with D. Jones re: same and call with J. Gross (8.2).	8.2	875.00	7,175.00
11/21/2021	DEJ	Call with M. Egan and A. Somers re: exhibit list (0.7); Review proposed trial exhibits (0.3).	1	575.00	575.00





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11/22/2021	JEG	Call w/ A. Somers about evidentiary issues.	0.2	875.00	175.00
11/22/2021	AJS	Work on JPTO and calls and emails with D. Jones and M. Egan and adversary re: same and call with J. Gross (6.6); emails with co-counsel re: stipulated fact and with client (.4).	7	875.00	6,125.00
11/22/2021	DEJ	Review and revise exhibit list, review additional documents for inclusion, call with A. Somers re: same (10.1); designate portions of deposition of Pan Dong Mei for use at trial, incorporate comments from A. Somers into same (1.4).	11.5	575.00	6,612.50
11/22/2021	JLW	Research database regarding financial statements and second amended LLC agreement (1.30); receive and review email from A. Somers regarding same (.10); research briefing on debtor's motion for entry of order approving bidding procedures (1.10); receive and review email from A. Somers regarding same (.10)	2.6	250.00	650.00
11/23/2021	AJS	Review proposed court order re: attachment for purposes of sheriff attaching and call with D. Jones re: same (.2); work on JPTO and calls and emails with D. Jones and M. Egan and adversary re: same (8.6).	8.8	875.00	7,700.00
11/23/2021	DEJ	Attention to exhibit list, coordinate exchange of exhibits with opposing counsel (4.5); review EH's exhibits and exhibit list, propose objections re: same, calls with A. Somers re: same (5.6); designate portions of depositions of R. Auerbach and R. Jolson for use at trial and incorporate comments from A. Somers re: same (1.8).	11.9	575.00	6,842.50
11/24/2021	AJS	Work on JPTO and calls and emails with D. Jones and M. Egan and adversary re: same and exchange exhibits and objections (5.2).	5.2	875.00	4,550.00



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Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

12/2/2021

**Invoice No.:**

6795

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
11/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
11/24/2021	DEJ	Attention to joint pre-trial order, calls with A. Somers and opposing counsel re: same, finalize and file same.	6.5	575.00	3,737.50
11/24/2021	JLW	Finalize and file proposed joint pre-trial order (.50); receive and review emails from D. Jones regarding same (.10)	0.6	250.00	150.00
11/29/2021	AJS	Emails to Y. Geron and group re: possible mediation with EH (.5); prepare for hearing on 12/1 (.3).	0.8	875.00	700.00
11/30/2021	AJS	Call with Y. Geron and group re: possible mediation with EH; call with K. Aulet re: same and further email to Y. Geron and group re: same and investigate mediators and emails re: same (1.7); prepare for Hearing on JPTO (1.9).	3.6	875.00	3,150.00
11/30/2021	DEJ	Call with Trustee and M. Egan re: settlement strategy.	0.5	575.00	287.50
TOTAL PROFESSIONAL FEES					316,907.50
REIMBURSABLE COSTS					
10/4/2021	LAS	USPS		0.73	0.73
10/31/2021	GEN	Westlaw Inv 845286528 - October 2021		762.08	762.08
11/3/2021	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
11/3/2021	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
11/4/2021	JLW	FedEx Inv 7-554-42854 TID 775072862706: J. Wingerter (RCT) to S. Arbeit, Esq., New York City, NY		24.04	24.04
11/10/2021	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
11/10/2021	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
11/12/2021	JLW	USPS - Serve US Trustee and Northwest Textile's Agent		3.52	3.52
11/15/2021	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
11/15/2021	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00



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11/30/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
11/19/2021	JLW	AA Express Transcripts Inv 6681: SDNY Transcript from Hearing on Motion for Attachment		255.00	255.00
		TOTAL REIMBURSABLE COSTS:			1,465.37
		INVOICE TOTAL			318,372.87
		Invoice 6631 dated 6/14/2021			33,443.77
		Invoice 6712 dated 8/16/2021			45,943.52
		Invoice 6747 dated 10/8/2021			138,843.25

**Balance Due**

\$536,603.41



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New York, NY 10017

**Invoice Date:**

1/25/2022

**Invoice No.:**

6835

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
12/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
12/1/2021	AJS	Review emails from and send emails to client re: mediation and research mediators re: same, and emails with counsel for Extreme Horse re: same (2.6), work on fee application (.8); prepare for and attend PTC (.5).	3.9	875.00	3,412.50
12/1/2021	DEJ	Prepare for and attend pretrial conference (0.5).	0.5	575.00	287.50
12/1/2021	JLW	Receive and review prior interim fee application from A. Somers (.1); convert same to a Word document, and forward to A. Somers (1.8).	1.9	250.00	475.00
12/2/2021	AJS	Review emails from and send emails to client re: mediation and research mediators re: same and reach out to mediator and emails with counsel for Extreme Horse re: same; call with Extreme Horse (1.7), work on fee application (2.6).	4.3	875.00	3,762.50
12/2/2021	DEJ	Call with opposing counsel re: mediation (0.4).	0.4	575.00	230.00
12/2/2021	JLW	Draft and revise certification of A. Somers in support of first interim fee application (.6); revise first interim fee application and form of order (.9); conference with A. Somers regarding same (.1).	1.6	250.00	400.00
12/3/2021	AJS	Speak to mediator and follow up work on mediation (.3); revise bills and work on fee application (2.1); call with R. Cavaliere (.4)	2.8	875.00	2,450.00
12/3/2021	DEJ	Call with R. Cavaliere re: potential mediation (0.4).	0.4	575.00	230.00



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Billing Through	Due Date:	Our File #
12/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
12/6/2021	AJS	Review email re: client's availability for mediation; emails with mediator re: same; review mediation agreement (1.2); work on fee application (1.8).	3	875.00	2,625.00
12/6/2021	DEJ	Proofread interim fee application and supporting documents (0.6).	0.6	575.00	345.00
12/7/2021	AJS	Emails re: mediation with client, and re: agreement; email to mediator re: same; emails to Extreme Horse re: same and re: length of statements, preliminary work on same (1.4).	1.4	875.00	1,225.00
12/8/2021	AJS	Review Extreme Horse's draft Answer and Motion to Dismiss email to D. Jones re: same (1.1); consideration of issue of timing and court status conference and Rule 26 report; discuss same with K. Aulet and T. Duffy (.6); emails with D. Jones re: strategy and Extreme Horse response (.3); draft email to J. Wiles chambers re: status conference; review and respond to response to chambers inquiry and follow up re: same (.4).	2.4	875.00	2,100.00
12/9/2021	AJS	Review and revise motion to approve mediation and email re: same (.3); analysis of answer affirmative defenses and research re: same; call with D. Jones (2.1); work on fee application (.4).	2.8	875.00	2,450.00
12/9/2021	DEJ	Calls and emails with A. Somers re: Extreme Horse's answer and motion to dismiss, status conference and Rule 26 report.	0.3	575.00	172.50
12/10/2021	AJS	Coordinate comments of mediation motion with Extreme Horse counsel, coordinate execution of the agreement with all counsel (.5).	0.5	875.00	437.50
12/13/2021	AJS	Emails with D. Jones re: motion to dismiss (.3) and review same and begin response (6.7); speak with M. Egan re: same (.1).	7.1	875.00	6,212.50



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12/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
12/14/2021	AJS	Work on opposition to Motion to Dismiss and Extreme Horse answer (6.4); emails with M. Egan re: lien and other issues and analysis of same (.6).	7	875.00	6,125.00
12/16/2021	AJS	Prepare for and attend court hearing/status conference (1.1); prepare update email for client (.3); begin to revise mediation to include Textile, emails to T. Duffy re: same; emails to mediator re: same email with client re: same (.9); schedule for motion to dismiss with T. Duffy (.1); revise fee application (.8); work on Motion to Dismiss (1.2).	4.4	875.00	3,850.00
12/16/2021	DEJ	Attend pre-trial conference.	0.5	575.00	287.50
12/17/2021	AJS	Work on opposition to motion to dismiss (6.6).	6.6	875.00	5,775.00
12/17/2021	DEJ	Review Textile's motion to dismiss, legal research for response to same.	5	575.00	2,875.00
12/17/2021	JLW	Pull cited cases in Northwest Textile's motion to dismiss and send link to same to team.	0.6	250.00	150.00
12/20/2021	AJS	Work on current and future creditor issue and calls with M. Egan and email with same and N. Santucci (.5); work on opposition to motion to dismiss (5.8); emails with counsel to Textile re: mediation (.2).	6.5	875.00	5,687.50
12/20/2021	DEJ	Draft response to Textile's motion to dismiss (3.5); call with A. Somers re same (0.4).	3.9	575.00	2,242.50



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12/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
12/21/2021	AJS	Work on opposition to motion to dismiss and emails and call with D. Jones re: same (7.1); emails with T. Duffy, K Aulet and mediator re: mediation statements and make small revisions and coordinate signing (.7).	7.8	875.00	6,825.00
12/21/2021	DEJ	Research exceptions in pari delicto, draft summary of same for response to Textile's motion to dismiss (5.5) ; call with A. Somers re: same (0.3),	5.8	575.00	3,335.00
12/22/2021	AJS	Work on Opposition to motion to dismiss (5.9); call with Morrison Cohen to coordinate cases and email with Y. Geron re: D&O liability and consider same (.8).	6.7	875.00	5,862.50
12/22/2021	DEJ	Calls with A. Somers (0.4); review and revise response to Textile's motion to dismiss (6.2),	6.6	575.00	3,795.00
12/22/2021	JLW	Preparation of table of contents and table of authorities in response to motion to dismiss.	1.6	250.00	400.00
12/23/2021	AJS	Work on opposition to motion to dismiss (4.7).	4.7	875.00	4,112.50
12/23/2021	DEJ	calls with A. Somers (0.4); review and revise response to Textile's motion to dismiss (4.0),	4.4	575.00	2,530.00
12/24/2021	AJS	Work on opposition to motion to dismiss; start mediation statement for Extreme Horse (2.9).	2.9	875.00	2,537.50
12/24/2021	DEJ	calls with A. Somers re: response to Textile's motion to dismiss (0.2); review comments from J. Gross re: same (0.8),	1	575.00	575.00

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12/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
12/27/2021	AJS	Discuss Motion to Dismiss with M. Egan and review email re: same (.3); email to client re: document management costs (.1); emails to adversaries re: need to meet and confer under Rule 26 (.1); revise Motion to Dismiss (1.1); work on Extreme Horse Extreme Statement (5.2).	6.8	875.00	5,950.00
12/27/2021	DEJ	Calls with A. Somers re: response to Textile's motion to dismiss (0.5); review and revise response to Textile's motion to dismiss (1.7); search document database for evidence of Ashford security interest (1.4).	3.6	575.00	2,070.00
12/28/2021	AJS	Speak to J. Marchese re: Motion to Dismiss and liens; work on Extreme Horse Mediation Statement (7.2); engage in lien analysis for Motion to Dismiss and emails with D. Jones and M. Egan and N. Santucci re: same (1.7).	8.9	875.00	7,787.50
12/28/2021	DEJ	Proofread and finalize response to Textile's motion to dismiss (2.2); research Bankruptcy Code and draft summary of same (1.5).	3.7	575.00	2,127.50
12/28/2021	JLW	Receive and review electronic notification from Court regarding deadlines to file redactions to pre-trial hearing transcript (.1); update calendar regarding same (.1).	0.2	250.00	50.00
12/29/2021	AJS	Work on Extreme Horse Mediation Statement (6.1); finalize Motion to Dismiss (.3).	6.4	875.00	5,600.00
12/29/2021	JLW	Finalize and file response in opposition to Defendant's motion to dismiss.	1.1	250.00	275.00
12/30/2021	AJS	Work on Extreme Horse Mediation Statement (6.8).	6.8	875.00	5,950.00





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12/31/2021		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
12/31/2021	AJS	Work on Extreme Horse Mediation Statement (7.3).	7.3	875.00	6,387.50
TOTAL PROFESSIONAL FEES					119,977.50
REIMBURSABLE COSTS					
11/30/2021	JLW	Westlaw Inv 845454633 - November 2021		1,894.82	1,894.82
11/30/2021	DEJ	Westlaw Inv 845454633 - November 2021		469.77	469.77
11/30/2021	AJS	Westlaw Inv 845454633 - November 2021		324.67	324.67
12/1/2021	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
12/1/2021	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
12/16/2021	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
12/16/2021	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
12/22/2021	JLW	11.3.2021 - AA Express Inv 6706: Transcript from Hearing on Motion to Amend Complaint		22.80	22.80
12/31/2021	DEJ	Westlaw Inv 845643652 - December 2021		194.34	194.34
12/31/2021	AJS	Westlaw Inv 845643652 - December 2021		169.80	169.80
TOTAL REIMBURSABLE COSTS:					3,356.20
INVOICE TOTAL					123,333.70
Invoice 6631 dated 6/14/2021					33,443.77
Invoice 6712 dated 8/16/2021					45,943.52
Invoice 6747 dated 10/8/2021					138,843.25
Invoice 6795 dated 12/2/2021					318,372.87

**Balance Due**

\$659,937.11

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370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

3/10/2022

**Invoice No.:**

6863

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
2/28/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
1/3/2022	DEJ	Review and revise mediation statements and exhibits thereto (2.4); calls with A. Somers re same (0.5); legal research on issues raised in Textile's reply, draft summary of same for A. Somers (2.0)	4.9	675.00	3,307.50
1/3/2022	JLW	Draft and revise corporate diagram for use at mediation.	1.6	250.00	400.00
1/3/2022	JEG	Call w/ A. Somers about mediation brief.	0.3	875.00	262.50
1/3/2022	AJS	Work on Extreme Horse Mediation Statement and Chart (2.8); emails with J. Wingerter re: same (.2); emails and calls with D. Jones re: same (.4); review comments of J. Gross re: same; review comments of M. Egan re: same Review Reply to MTD (1.9).	5.3	875.00	4,637.50
1/4/2022	DEJ	Gather and finalize exhibits to mediation statements and emails with A. Somers (0.8); research "good faith" standard under Section 550(b)(1) (2.0)	2.8	675.00	1,890.00
1/4/2022	JEG	Review mediation statement and emails re same.	1	875.00	875.00
1/4/2022	AJS	Calls and emails with D. Jones re: Reply and review cases found by same (.4); emails with R. Cavaliere re: mediation arrangement and payment (.3); email to client re: same (.1); work on Textile Mediation Statement (4.2); email with client about post-closing motion (.1); email with M. Egan re: liens and Textile MTD (.4).	5.5	875.00	4,812.50



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2/28/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
1/5/2022	DEJ	Emails and calls with A. Somers (0.3); prepare combined statement of facts as exhibit to Textile mediation statement (1.0); review and revise Textile mediation statement (2.4)	3.7	675.00	2,497.50
1/5/2022	AJS	Emails with M. Egan re: facts (.6); work on Textile Mediation Statement (3.3); email to client re: same (.1); emails and calls with D. Jones re: Mediation Statement and MTD (.7); prepare to argue MTD (.5).	5.2	875.00	4,550.00
1/6/2022	DEJ	Attend hearing on Textile's motion to dismiss (0.7); calls with A. Somers (0.2); research standard for "insider" status for purposes of in pari delicto doctrine (1.0); cite check Textile mediation statement (1.8)	3.7	675.00	2,497.50
1/6/2022	JLW	Preparation of exhibits to mediation statements.	1.1	250.00	275.00
1/6/2022	JEG	Review of second mediation statement and emails re same.	1	875.00	875.00
1/6/2022	AJS	Review emails from D. Jones re: Mediation Statement and MTD (.6); email with M. Egan re: same (.1); prepare to argue MTDs and attend hearing for sale and follow-up (3.7); review comments of J. Gross and incorporate into mediation statement (.9); email with D. Jones and J. Wingerter re: mechanics and exhibits (.2).	5.5	875.00	4,812.50
1/7/2022	DEJ	Finalize and serve mediation statements (1.0); calls and emails with A. Somers re same (0.3)	1.3	675.00	877.50
1/7/2022	JLW	Finalize exhibits to mediation statements (.20); receive and review email from D. Jones regarding same (.10).	0.3	250.00	75.00



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Date	Timekeeper	Description	Hours	Rate	Fee
1/7/2022	AJS	Finalize mediations statements (2.9); emails and calls with D. Jones re: same (.1); emails with T. Duffy re: same (.1); email with R. Cavaliere re: same (.1); review mediation statements of Extreme Horse and Textile (1.8).	5	875.00	4,375.00
1/10/2022	DEJ	Review and revise proposed order granting in part and denying in part Textile's motion to dismiss (0.2)	0.2	675.00	135.00
1/10/2022	JLW	Receive, review, and update calendar regarding deadlines to redact transcripts from 11/10/21 OSC Scheduling Conference and from 11/15/21 Motion for Order of Attachment Hearing (.40); receive and review order on Northwest Textile's motion to dismiss, and update calendar on deadline for Northwest Textile to file answer to amended complaint (.20).	0.6	250.00	150.00
1/10/2022	AJS	Work on proposed order for MTD and email with T. Duffy re: same (1.5); continue review mediation statements of Extreme Horse and Textile; email and call with K. Aulet re: mediation (.3); emails with R Cavaleire re: same (.3); emails with client re: same (.2).	2.3	875.00	2,012.50
1/13/2022	AJS	Prepare for mediation especially issue of purchase order argument not being consistent with APA (1.1); emails and calls with mediator (.4); and emails with D. Jones M. Egan re: same (1.3).	2.8	875.00	2,450.00
1/14/2022	DEJ	Attend mediation (3.0); research whether Trustee must first collect from property fraudulently conveyed before enforcing judgment against transferees (1.0)	4	675.00	2,700.00
1/14/2022	JLW	Email court reporter regarding status of obtaining audio tapes from 9/28/21 hearing.	0.1	250.00	25.00



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Date	Timekeeper	Description	Hours	Rate	Fee
1/14/2022	AJS	Attend mediation and calls with client, D. Jones re: same, N. Santucci and M. Egan re: same (9.0).	9	875.00	7,875.00
1/17/2022	AJS	Calls with mediator and work on settlement with Extreme Horse and emails with Y. Geron re: same; emails with M. Egan re: same (4.4).	4.4	875.00	3,850.00
1/18/2022	AJS	Review email from client to co-counsel re: global settlement and follow-up; emails with M. Egan re: same (1.3); call with mediator re: settlement and continue to work on settlement with both Extreme Horse and Textile (2.2).	3.5	875.00	3,062.50
1/19/2022	JLW	Update calendar regarding pre-trial conference setting; receive and review email from A. Somers regarding same.	0.1	250.00	25.00
1/19/2022	AJS	Work on settlement with Extreme Horse and Textile and emails with D. Jones re: Miami Properties (3.2); and with M. Egan; emails re: change of pre-trial conference (.2).	3.4	875.00	2,975.00
1/20/2022	DEJ	Emails with A. Somers re sale of Miami properties.	0.4	675.00	270.00
1/20/2022	AJS	Call with mediator and review detailed emails re: settlement and proceeds and work on same; email with client and D. Jones and mediator re: same (3.6).	3.6	875.00	3,150.00
1/21/2022	AJS	Call re: settlement with Extreme Horse and Textile and emails with mediator (1.7).	1.7	875.00	1,487.50
1/23/2022	AJS	Read and review mediator's proposal and discuss with mediator; emails with mediator re: same (3.1).	3.1	875.00	2,712.50



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**Fax: 512.647.6129**

Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

3/10/2022

**Invoice No.:**

6863

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
2/28/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
1/24/2022	DEJ	Call with Trustee and A. Somers re settlement strategy (0.3); legal research re substantial contribution in converted Chapter 7 cases (3.4).	3.7	675.00	2,497.50
1/24/2022	AJS	Work on mediator's proposal and emails with Client and firm and D. Jones and M. Egan re: same and work on Textile settlement (6.1).	6.1	875.00	5,337.50
1/25/2022	DEJ	Attend pre-trial conference (0.4); research contribution claims between initial and subsequent transferees (1.1).	1.5	675.00	1,012.50
1/25/2022	JLW	Receive and review Northwest Textile's answer and cross-claims (.20); update calendar regarding deadline to file motion to strike, answer, or otherwise respond (.20).	0.4	250.00	100.00
1/25/2022	AJS	Continue to work on a settlement with Textile and emails with client re: same and M. Egan re: Textile assets (1.8) and prepare for an attend pre-trial conference (.8); work on Extreme horse Settlement (1.5).	4.1	875.00	3,587.50
1/26/2022	DEJ	Review settlement agreement and provide comments on same.	0.6	675.00	405.00
1/26/2022	AJS	Work on settlement agreement with Extreme Horse (5.5); emails with D. Jones and K Aulet re: same; work on settlement with Textile (.7).	6.2	875.00	5,425.00
1/27/2022	AJS	Work on settlement with Textile and emails and calls to mediator and to client re: same (1.2); work on Extreme Horse Settlement agreement and draft Rule 9019 pleadings (4.4).	5.6	875.00	4,900.00
1/28/2022	DEJ	Revise Rule 9019 Motion pursuant to comments from A. Somers.	0.4	675.00	270.00



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Date	Timekeeper	Description	Hours	Rate	Fee
1/28/2022	AJS	Work on settlement agreement; work on Extreme Horse Settlement agreement and draft Rule 9019 pleadings and order and email with K. Aulet and consider comments from same (5.2); emails with D. Jones and K. Aulet re: same and incorporate comments (.8).	6	875.00	5,250.00
1/29/2022	AJS	Work on and draft Rule 9019 pleadings and order and emails with K. Aulet re: settlement and approval of same (4.9).	4.9	875.00	4,287.50
2/1/2022	DEJ	Review amendment to mediation agreement, circulate comments on same to A. Somers & Trustee.	0.4	675.00	270.00
2/2/2022	DEJ	Review Extreme Horse settlement agreement, incorporate changes from N. Santucci on same.	0.2	675.00	135.00
2/2/2022	AJS	Review comments to Rule 9019 and order from N. Santucci and follow-up emails; review D. Jones emails (.4).	0.4	875.00	350.00
2/4/2022	DEJ	Update amendment to mediation agreement and circulate same (0.6); update settlement agreement to incorporate research re attachment order (0.7).	1.3	675.00	877.50
2/4/2022	AJS	Review email from counsel from Extreme Horse to Textile (.1); address mediation agreement amendment (.2); email with N. Santucci re: settlement agreement (.1).	0.4	875.00	350.00
2/7/2022	AJS	Emails with K. Aulet re: settlement agreement and service same (1.7); address mediation agreement amendment and payment of mediator fee (.3); receive settlement agreement comments from N. Santucci; work on textile settlement (.9).	2.9	875.00	2,537.50

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2/8/2022	JLW	Preparation of exhibits to motion to approve settlement; receive and review email from A. Somers regarding same.	0.3	250.00	75.00
2/8/2022	AJS	Address mediation agreement amendment and payment of mediator fee (.4); address issues re: Rule 2004 filed in main case and call with N. Santucci re: same; (.7); draft and revise notice of hearing and incorporate comments from J. Litos (.5).	1.6	875.00	1,400.00
2/9/2022	JLW	Finalize and file motion to approve settlement and notice of hearing (.70); sign-up for Court-Solutions hearing participation for A. Somers and D. Jones (.10); update calendar accordingly (.10).	0.9	250.00	225.00
2/9/2022	AJS	Attend to service of pleadings (.2); review Rule 2004 objection and follow-up on same (.4).	0.6	875.00	525.00
2/10/2022	DEJ	Attend pretrial conference (0.5); review and revise case management plan from opposing counsel (0.8).	1.3	675.00	877.50
2/10/2022	AJS	Emails with Y. Geron and N. Santucci and Ed Gilbert in anticipation of hearing and re: Rule 2004 in main case and tolling (.8); attend pre-trial conference (.5); work on voluntary exchange of documents and Case Management Order (2.2).	3.5	875.00	3,062.50
2/14/2022	DEJ	Review document database to determine extent of Textile's prior productions (1.9); Review form case management, scheduling, and pretrial order forms for Judge Wiles and incorporate same not proposed case management plan (0.7).	2.6	675.00	1,755.00



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Date	Timekeeper	Description	Hours	Rate	Fee
2/14/2022	AJS	Consider request by Textile and participation in Examiner Motion discovery and call with M. Egan re: documents and review emails re: same and work on description of what documents Trustee will turn over (3.2); review motion to approve mediation amendment (.5).	3.7	875.00	3,237.50
2/15/2022	AJS	Review emails re: CIT from client and co-counsel (.2); work on case management order, especially location of and access to documents and email with T. Duffy (2.6); review numerous emails re: 2004 (.3).	3.1	875.00	2,712.50
2/16/2022	DEJ	Emails with A. Somers & J. Gross re case management order and further discovery	0.4	675.00	270.00
2/16/2022	JLW	Preparation of all public pleadings and upload same to FTP site for M. Dundon.	0.6	250.00	150.00
2/16/2022	JEG	Emails regarding discovery protocol.	0.3	875.00	262.50
2/17/2022	JEG	Emails regarding discovery protocol.	0.3	875.00	262.50
2/17/2022	AJS	Work on case management order and discovery information emails with J. Gross re: same; emails with M. Egan and T. Duffy (1.7).	1.7	875.00	1,487.50
2/18/2022	DEJ	Review and revise case management plan to incorporate format and content of Judge Wiles's form scheduling orders and previous discovery.	0.6	675.00	405.00
2/18/2022	JEG	Emails about scheduling order and discovery.	0.3	875.00	262.50



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2/18/2022	AJS	Work on case management order and discovery information; numerous emails with M. Egan and T. Duffy and D. Jones (2.7).	2.7	875.00	2,362.50
2/21/2022	AJS	Work on Case Management Order and emails with T. Duffy (.9); work on initial disclosure (.5).	1.4	875.00	1,225.00
2/22/2022	DEJ	Review and revise initial disclosures.	0.3	675.00	202.50
2/24/2022	JLW	Receive, review, and update calendar regarding Case Management Order.	0.7	250.00	175.00
TOTAL PROFESSIONAL FEES					128,427.50
REIMBURSABLE COSTS					
1/4/2022	JLW	11.10.2021 - AA Express Inv 6706: Transcript from Hearing on Order to Show Cause		17.59	17.59
1/6/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
1/6/2022	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
1/17/2022	JLW	AA Express Inv 6718: Transcript from Hearing re 10-10990 - mew on 9.28.2021		152.19	152.19
1/25/2022	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
1/25/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
1/31/2022	9999 FIRM	Westlaw Inv 845806261 - January 2022		399.57	399.57
2/10/2022	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
2/10/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
TOTAL REIMBURSABLE COSTS:					989.35
INVOICE TOTAL					129,416.85
Invoice 6631 dated 6/14/2021					33,443.77
Invoice 6712 dated 8/16/2021					45,943.52
Invoice 6747 dated 10/8/2021					138,843.25
Invoice 6795 dated 12/2/2021					318,372.87
Invoice 6835 dated 1/25/2022					123,333.70

**Balance Due**

\$789,353.96



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4/27/2022

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6888

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
3/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
3/1/2022	AJS	Review Objections to Settlement and begin working on responses.	6.6	875.00	5,775.00
3/1/2022	JLW	Receive and review for differences objections to settlement filed by Textile and Estate of Auerbach.	0.4	250.00	100.00
3/2/2022	AJS	Review objections to settlement and begin working on responses (4.3); communications with D. Jones re: objection (.3); calls with K. Aulet re: same (.6); communication with T. Duffy re: discovery request and with M. Egan re: same (.1).	5.3	875.00	4,637.50
3/2/2022	DEJ	Review and revise response to objection to settlement from Shay Auerbach LLC.	1.2	675.00	810.00
3/3/2022	AJS	Review objections to settlement and begin working on responses (1.7); communications with D. Jones re: objection (.7); calls with K. Aulet re: same (.7); communication with M. Egan re: discovery (.2).	3.3	875.00	2,887.50
3/3/2022	DEJ	Review and revise response to objection to settlement from Shay Auerbach LLC.	1.7	675.00	1,147.50
3/4/2022	AJS	Review objections to settlement and begin working on responses (8.4); call with N. Santucci re: Shay Auerbach LLC claim and follow up on same (.4)	8.8	875.00	7,700.00

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Date	Timekeeper	Description	Hours	Rate	Fee
3/4/2022	DEJ	Research re power to enjoin claims to effect settlement, draft and revise summary of same (2.1); review and revise response to objections to EH settlement, calls with A. Somers re same (1.2).	3.3	675.00	2,227.50
3/4/2022	JLW	Finalize and file response to Shay Auerbach's objection to motion for approval of a settlement agreement resolving claims in adversary proceeding (.6); finalize and file response to Northwest Textile Holdings' objection to motion for approval of a settlement agreement resolving claims in adversary proceeding (.6); receive and review emails from A. Somers regarding same (.1).	1.3	250.00	325.00
3/8/2022	DEJ	Research re shifting costs of production, draft summary of same for A. Somers.	1.4	675.00	945.00
3/8/2022	AJS	Review objection to settlement and make points to respond; emails to client re: same and discussion of same (.2); work on cost shifting for production of documents (.4); emails with Morrison Cohen (.1); review EH bank account information (.1); investigate production issues and communications with T. Duffy re: same and emails with M. Egan re: same (1.8); work on discovery (1.1).	3.7	875.00	3,237.50
3/8/2022	JLW	Confirm that A. Somers and D. Jones are registered for remote hearing (.1); receive and review email from A. Somers regarding same (.1).	0.2	250.00	50.00



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Date	Timekeeper	Description	Hours	Rate	Fee
3/9/2022	AJS	Prepare for and attend Settlement Agreement Approval hearing and calls with K. Aulet re: same; investigate production issues and communications with T. Duffy re: same and emails with M. Egan re: same (1.1); work on discovery requests and analysis (2.1).	3.2	875.00	2,800.00
3/10/2022	AJS	Investigate production issues and communications with T. Duffy re: same and emails with M. Egan re: same (.5); and work on documents requests (1.9); discuss settlement with K. Aulet and work on same and review and later proposed language (.9); review request sent to Ashford (.5).	3.8	875.00	3,325.00
3/11/2022	AJS	RFPs and RFAs (2.7) and communications with M. Egan and T. Duffy re: same and work on documents requests (.3); discuss settlement with K. Aulet and work on same and review and later proposed language and notice to textile (1.2).	4.2	875.00	3,675.00
3/14/2022	DEJ	Review and revise draft requests for admission and requests for production to Textile.	1.9	675.00	1,282.50
3/14/2022	AJS	Discuss settlement with K. Aulet and work on same in light of Textile's concerns and numerous emails re: same; make revisions, emails with D. Jones re: same (1.2); work on RFPs and RFAs and other discovery issues communications D. Jones re: same (2.7).	3.9	875.00	3,412.50
3/15/2022	JEG	Emails concerning discovery and strategy and revise discovery requests.	1.2	875.00	1,050.00



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3/15/2022	AJS	Finalize RFPs and RFAs and communications with J. Gross re: same (1.3); and work on additional discovery issues (.9); review Textile discovery requests and emails re: same (1.5); work on voluntary production for Textile (.8).	4.5	875.00	3,937.50
3/16/2022	AJS	Work on Extreme Horse settlement and communications with K. Aulet re: same (1.1); communications with M. Egan re: voluntary production (.5); work on discovery (2.1).	3.7	875.00	3,237.50
3/16/2022	JLW	Receive, review, and save to scan drive NW Textile's document subpoena to Ashford Textile's (.1); calendar deadline to file objection (.1); review Judge Wiles' docket regarding hearing on motion to approve settlement agreement resolving claims against Extreme Horse Limited (.1); sign up for court call regarding same (.1).	0.4	250.00	100.00
3/17/2022	AJS	Work on Extreme Horse settlement (.6); work on discovery issues (2.1).	2.7	875.00	2,362.50
3/18/2022	AJS	Review communication with T. Duffy re: tolling and estate claims.	0.1	875.00	87.50
3/18/2022	JLW	Receive, review, and update calendar regarding Court's email changing start time of hearing on motion to approve settlement.	0.1	250.00	25.00
3/20/2022	AJS	Draft email to client re: global issues.	0.8	875.00	700.00
3/21/2022	AJS	Review Textile's CIT request with M. Egan to determine overlap with Trustee's; communications with K. Aulet re: settlement (.6); emails with client re: same (.2); communications with T. Duffy and M. Egan re: discovery (1.1).	1.9	875.00	1,662.50



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3/21/2022	JLW	Receive, review, and save to file NW Textile's subpoenas to produce documents to Rivkin Radler LLP and CIT Group/Commercial Services (.1); update calendar regarding deadline to file objections to same (.1).	0.2	250.00	50.00
3/22/2022	AJS	Communications with Y. Geron and J. Marchese regarding documents and request and review Textile requests and review documents and consider same (.5); work on Extreme Horse settlement and communication with client re: same and communications with K. Aulet re: same and with J. Litos re: same (1.7); review email re: Extreme Horse discovery and peruse documents (.2); work on discovery issues and communications with Textile's counsel re: same (1.4).	3.8	875.00	3,325.00
3/23/2022	AJS	Email with N. Santucci re: CIT request.; review email from Ashford re: document request and communications with same (.5); work on issues involving expert witness (.3); work on settlement and communications with K. Aulet and client re: same and work on revised order for settlement and Communications with Textile's counsel re: same (2.4).	3.2	875.00	2,800.00
3/24/2022	JEG	Discuss indemnity and contribution issues w/ A. Somers.	0.2	875.00	175.00
3/24/2022	AJS	Work on settlement and communications with K. Aulet and client re: same and work on revised order for settlement and communications with Textile's counsel re: same and legal issues re: same (3.8); review emails re: broader Ashford issues (.2); review discovery requests by Textile and emails with M. Egan re: discovery (.8).	4.8	875.00	4,200.00
3/25/2022	DEJ	Legal research re effect of General Obligations Law 15-108(a) and calls and emails with A. Somers re same.	2.2	675.00	1,485.00



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3/25/2022	AJS	Work on settlement and communications with K. Aulet and client re: same and work on revised order for settlement (1.1); review K. Aulet email re: legal position; work on memorandum of law (4.6).	5.7	875.00	4,987.50
3/25/2022	JLW	Finalize and file in Memorandum of Law in Support of Trustee's Motion for Approval of Settlement Agreement Resolving Claims in Adversary Proceeding Against Extreme Horse Limited Pursuant to Bankruptcy Code Section 105 and Bankruptcy Rule 9019 and Modifying the Attachment Order in main Bankruptcy action and Adversary Proceeding.	0.6	250.00	150.00
3/28/2022	DEJ	Review and revise reply in support of settlement.	1.6	675.00	1,080.00
3/28/2022	AJS	Draft email to N. Santucci re: Ashford discovery issues and communications re: same (.4); review response from Textile regarding settlement and communications with K. Aulet re: same and begin reply (3.9); review Extreme Horse letter re: adjournment and response by Textile and communications with K. Aulet re: same (.7); review email re: buyer for Miami property, communication with client re: same; review chart made by J. Wingerter re: real estate values (.5); discuss and make changes to order with K. Aulet for Extreme Horse settlement in light of Textile objections (1.1).	6.6	875.00	5,775.00





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3/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
3/28/2022	JLW	Receive, review, save to file, and circulate NW Textile's response to the Trustee's memorandum of law in support to approve settlement (.1), NW Textile's response to letter response to Extreme Horse's statement in support of amended settlement statement (.1), and Extreme Horse's statement in support of amended settlement statement (.1); research sales comps of condo units located at 1100 Biscayne Blvd (Miami property), and prepare spreadsheet regarding same (1.1); finalize and file Reply in Support of Motion for Approval of a Settlement Agreement Resolving Claims in Adversary Proceeding Against Extreme Horse Limited Pursuant to Bankruptcy Code Section 105 and Bankruptcy Rule 9019 and Modifying the Attachment Order (.4).	1.8	250.00	450.00
3/29/2022	DEJ	Attend hearing on motion to approve settlement (0.4); legal research re scope of GOL 15-108 and draft and revise talking points for hearing re same (0.7).	1.1	675.00	742.50
3/29/2022	AJS	Prepare for and attend hearing for approval of the Extreme Horse settlement and revise order.	6.2	875.00	5,425.00
3/30/2022	DEJ	Call with A. Somers re subpoena to Rivkin Radler (0.4); review updated order from Judge Wiles and call with A. Somers re same (0.3).	0.7	675.00	472.50
3/30/2022	AJS	Review email from Rivkin Radler, communications with D. Jones and T. Duffy re: same and research re: same (1.5); review trustee's subpoena re: CIT and other discovery work (1.8).	3.3	875.00	2,887.50



Please Remit to:  
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1301 S Capital of Texas Hwy  
Building C, Suite 300  
Austin, Texas 78746  
Main: 512.647.6100  
Fax: 512.647.6129

Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

4/27/2022

**Invoice No.:**

6888

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
3/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
3/31/2022	AJS	Review Judge's revised order (.2); address further sale of Miami condos (.3); address production issues with Rivkin Radler and review letter and review email from T. Duffy re: same (.4); work on further discovery issues (2.7).	3.6	875.00	3,150.00
		Subtotal Professional Fees			94,655.00
		REIMBURSABLE COSTS			
3/9/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
3/29/2022	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
3/29/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
		TOTAL REIMBURSABLE COSTS:			210.00
		INVOICE TOTAL			94,865.00
		Invoice 6631 dated 6/14/2021			33,443.77
		Invoice 6712 dated 8/16/2021			45,943.52
		Invoice 6747 dated 10/8/2021			138,843.25
		Invoice 6795 dated 12/2/2021			318,372.87
		Invoice 6835 dated 1/25/2022			123,333.70
		Invoice 6863 dated 3/10/2022			129,416.85

**Balance Due** \$884,218.96

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**Invoice Date:**

6/8/2022

**Invoice No.:**

6915

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
4/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
4/1/2022	DEJ	Conference call with A. Somers and Y. Geron re discovery & global settlement discussions.	0.5	675.00	337.50
4/1/2022	AJS	Communications with J. Marchese re: documents and follow up (.2); review stipulation with Ashford (.2); search for an expert and check Daubert records and communications with M. Egan re: same (1.5); review Ashford response to subpoena and review emails about meet and confer (.2); work on claims (.4); conference call with D. Jones and Y. Geron (.5).	3	875.00	2,625.00
4/4/2022	AJS	Communications with M. Egan and B. Bollinger regarding documents and Ashford subpoena (.7); emails with T. Duffy and B. Bollinger regarding the Trustee participation of a meet and confer with Ashford and communications with T. Klestadt re: same (.8). Communications with M. Egan re: production and other issues. (.9); follow up on proceeds from EH (.2); work on claims and review documents (2.1); communications with Yann re: proceeds for Extreme Horse settlement (.2).	4.9	875.00	4,287.50
4/5/2022	AJS	Communications with T. Duffy and numerous communications with counsel for Ashford re: meet and confer and document production and communications with M. Egan re: same (1.7); work on claims and review documents (1.3).	3	875.00	2,625.00



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Billing Through	Due Date:	Our File #
4/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
4/6/2022	AJS	Communications with J. Litos and N. Santucci re: Mazars and call with M. Egan re: same and follow up (.4); communications with E. Gilbert and M. Egan about CIT production; emails with J. Gross re: work product and accountants and follow up on same (.5); communications with N. Santucci and J. Litos re: CIT (.3); communications with T. Duffy re: production of documents and follow up on same (.4) conference call with CIT and E. Gilbert; and draft email and letter to Bill Kelly and coordinate same with M. Egan (1.1); review Mazars documents (.4).	3.1	875.00	2,712.50
4/7/2022	AJS	Review closing proceeds for Extreme Horse settlement (.4); review emails re: expert and work on same (.6); review emails re: Ashford production to Textile and communications and follow up re: same (.3).	1.3	875.00	1,137.50
4/8/2022	AJS	Communications with M. Egan re: Ashford claim and production issues and work on discovery requests (.9).	0.9	875.00	787.50
4/11/2022	AJS	Follow up on Jolson and Ashford discovery and communications with M. Egan (.4); work on claim and consider expert issues and review Ashford Stipulation (1.7).	2.1	875.00	1,837.50
4/12/2022	AJS	Review Ashford Stipulation (.2); follow up on proceeds of Extreme Horse settlement (.2); review Extreme Horse document response (.2); communications with M. Egan re: Jack Burns and Ashford, and regarding expert and follow up on both and follow up (1.5); communications with counsel to Ashford re: discovery; review opinions of potential expert witness and follow up on same (2.1); work on claims (1.1).	5.3	875.00	4,637.50



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**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
4/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
4/13/2022	AJS	Review Communication re: Rifkin production (.1); communications with T. Duffy re: production and follow up (.4); address Textile deposition and communications with T. Duffy re: same (.3); address closing of Miami condominium issues and emails with J. Litos and K. Aulet and review answer to cross-claim (.7); work on expert engagement (1.2); review documents and work on claims (2.2).	4.9	875.00	4,287.50
4/14/2022	AJS	Work on Pan Don Mei deposition (.4); work on potential confidentiality agreement and document request (2.6); review Textile response to request for admissions (.8).	3.8	875.00	3,325.00
4/15/2022	JEG	Discuss depositions and discovery with A. Somers.	0.2	875.00	175.00
4/15/2022	AJS	Address issues re: possible Jack Burns deposition ,work on same and discuss same with J. Gross (1.5); discuss CTG report with M. Egan and conversations with CTG about same (.6).	2.1	875.00	1,837.50
4/18/2022	AJS	Emails with expert to pin down cost and follow up on same and calls with alternative experts (1.7); review emails re: CIT production and search of system; review response to request for production and follow up on same (.5); review emails re: Ashford production (.3) emails re: Pan Dong Mei deposition (.2); review Textile response to production and work on claim and evidence (2.3).	5	875.00	4,375.00
4/19/2022	AJS	Follow up for Jack Burns deposition and discuss with counsel (.5); review emails re: Ashford production (.3); communications with H. Rosenblatt and M. Egan re: CIT production (.4); review stipulation re: Ashford Note Claim; search for documents and work on claims (1.6).	2.8	875.00	2,450.00



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Billing Through	Due Date:	Our File #
4/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
4/20/2022	AJS	Review emails re: CIT production and follow up on same with H. Rosenblatt and M. Egan (.4); review emails re: Ashford production and follow up on same (.4); work on claims (1.1).	1.9	875.00	1,662.50
4/21/2022	AJS	Review emails re: conference with court re: discovery from Ashford (.7); emails re: proceeds of stake of Miami property (.2); emails re: production to Textile; communications with M. Egan re: production to Textile and follow up on same (.6); communications with T. Duffy re: requests (.2); review Ashford evidence and other evidence (2.6).	4.3	875.00	3,762.50
4/22/2022	AJS	Communications with T. Duffy re: meet and confer communications with K. Aulet re: deposition of Pan Dong Mei and scope (.2); draft notice of deposition and further emails re: same (2.9); communications with court reporter and counsel re: Jack Burns deposition (.4); review Mazar evidence (.8).	4.3	875.00	3,762.50
4/25/2022	AJS	Work on Pan Don Mei deposition (.5); emails with M. Egan re: Jack Burns testimony and follow up on same (.6); amend initial disclosures and arrange to file and email with J. Gross re: same (1.5); address CTG production review (.4) emails re: follow up on production with CIT and review communications with CIT counsel and follow up re: same (.4); review list of claims that existed as of 5/2017 and petition date and review claims re: same (1.1); work on claims (1.2); draft email to client re: expert and other expenses (.3); email to Mazars re: status of request (.1); email to T. Duffy re: third party production (.1).	6.2	875.00	5,425.00



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New York, NY 10017

**Invoice Date:**

6/8/2022

**Invoice No.:**

6915

**RE: Adversary Proceeding**

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4/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
4/26/2022	AJS	Send M. Egan email re: claims and discuss proofs of claim with M. Egan and further work on same (.8); respond to emails and discuss expenses of expert with Y. Geron and others (.3); call with Ashford re: claim issues and follow up on same (.9); work on expert engagement letter and send to client with pleading related to approval (.5); review further email re: CIT production and communications with Morrison Cohen re: same (.3); review documents re: Jack Burns (.7); work on claims (1.7).	5.2	875.00	4,550.00
4/27/2022	AJS	Email with Y. Geron re: receipt of Miami condominium sale proceeds; review M. Egan's response to claims list and further discussion of same by email (.4) re: call with CIT and further emails re: same and follow up (.5); work on evidence and proving claims (1.3).	2.2	875.00	1,925.00
4/28/2022	AJS	Review M. Egan's response to claims list and further communication of same by email and follow up on addressing allowed claims for litigation (1.9); review emails re: productions and hosting (.4).	2.3	875.00	2,012.50
4/29/2022	AJS	Communications with Morrison Cohen and CIT counsel re: production (.3); review emails re: Ashford production and review letter re: same (.5); review trustee revisions to Quintero engagement and revise same (.5).	1.3	875.00	1,137.50
INVOICE TOTAL					61,675.00
Invoice 6631 dated 6/14/2021			6,688.76		
Invoice 6712 dated 8/16/2021			9,188.70		
Invoice 6747 dated 10/8/2021			27,768.65		
Invoice 6795 dated 12/2/2021			63,674.57		
Invoice 6835 dated 1/25/2022			123,333.70		
Invoice 6863 dated 3/10/2022			129,416.85		
Invoice 6888 dated 4/27/2022			94,865.00		

**Balance Due**

**\$516,611.23**



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**Invoice Date:**

7/8/2022

**Invoice No.:**

6941

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
5/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
5/2/2022	AJS	Review documents and attend to discovery dispute with Ashford, and discuss hearing with counsel for Ashford through emails with B. Bollinger and T. Klestadt (1.3); work on expert retention (.5); follow up on availability of document on Platinum with M. Egan (.2); draft request for production for Ross Auerbach (1.1); review documents and work on claims (.9).	4	875.00	3,500.00
5/3/2022	AJS	Discuss interview with J. Burns internally and with co-counsel and emails with E. Gilbert and with M. Egan re: same (.9); email with J. Gross re: work papers pf Mazars (.2); emails re: Ashford turnover of documents to Trustee; participate in discovery conference and follow up (.7); work on request for documents and claims (1.6).	3.4	875.00	2,975.00
5/4/2022	JEG	Advise about discovery issues.	0.2	875.00	175.00
5/4/2022	AJS	Discuss interview with J. Burns internally and with co-counsel and emails with E. Gilbert and with M. Egan re: same (.8); emails with J. Gross technical specifications and follow up on same (.3); verify funds from sale of Miami property (.2); review request to Mazars and emails with M. Egan and D. Jones re: same (.3); review and respond to emails from Rivkin re: production (.1) ; emails re: privileged documents with M. Egan and K. Stevens (.1); emails with M. Egan re: Ashford discovery request and (.2); work on request and claims (1.6); call with J. Gross (.2).	3.8	875.00	3,325.00



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**Invoice Date:**

7/8/2022

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**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
5/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
5/5/2022	AJS	Review final disclosure for EH settlement emails with K. Aulet and Jeanette Litos (.3); review Rivkin documents (.3); review emails re: CIT production (.2); review documents and work on claims (2.1).	2.9	875.00	2,537.50
5/6/2022	AJS	Emails with T. Duffy re: discovery relating to Ashford and other issues and follow up to same and R. Auerbach deposition (.3); review email re: discovery from EH and communications with K. Aulet re: Pan Don Mei deposition (.5); work on claims (.9).	1.7	875.00	1,487.50
5/9/2022	AJS	Emails with T. Duffy re: discovery relating to Ashford and other issues and follow up to same (.3); emails re: zoom deposition with T. Duffy (.1); communications with M. Egan re: CTG documents (.3).	0.7	875.00	612.50
5/10/2022	DEJ	Draft and revise subpoenas to Mazars USA.	2.1	675.00	1,417.50
5/10/2022	AJS	Review email re: Stella Lellos deposition from T. Duffy and review emails from M. Egan re: Stella Lellos (.3); review emails re: Ashford production; communications re: CIT production (.3).	0.6	875.00	525.00
5/11/2022	DEJ	Incorporate edits from A. Somers and M. Egan into subpoena to Mazars USA, coordinate service of same.	1.4	675.00	945.00
5/11/2022	AJS	Communications with D. Jones and M. Egan re: Mazars documents request and work on claim re: same (1.5); review email re: EH settlement and proceeds and follow up (.2); communications with K. Aulet re: EH settlement payments (.2); discuss Ashford production with M. Egan (.2).	2.1	875.00	1,837.50



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5/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
5/12/2022	AJS	Communications with K. Aulet re: documentation authentication and re: EH settlement (.6); revise expert agreement and emails from D. Amedeo re: same (.8); revise Letter of Engagement of expert (.3); communications with T. Klestadt re: deposition of Ashford textiles and emails with D. Amedeo re: Allen Guo and review documents re: same (1.1); review communications re: CIT deposition (.3) ; work on expert retention (.2); review documents work on proof for claim and further evidence needed (1.7).	5	875.00	4,375.00
5/13/2022	DEJ	Draft and revise subpoena to Richard Danderline, incorporate comments from M. Egan and A. Somers into subpoena and coordinate service of same.	1.7	675.00	1,147.50
5/13/2022	AJS	Emails with M. Egan re: insider claims and proofs of claim review (.3); emails with D. Jones re: Danderline subpoena and related issues (.2); review emails re: Ashford production, and Allen Guo depositions (.4); emails with adversary re: deposition schedule; communications re: CIT production and review CIT documents and further develop claims (.8); work on claims and future depositions needed (1.9).	3.6	875.00	3,150.00
5/16/2022	DEJ	Draft and revise order of proof, calls with A. Somers re same	2.4	675.00	1,620.00
5/16/2022	AJS	Communications with J. Wingerter and D. Jones re: production and review documents (1.7); communications with E. Gilbert and H. Rosenblatt re: J. Burns meeting (.2); develop narrative/timeline for case and review comments of M. Egan re: same (1.6); attend to issues re: 5/24 hearing (.1); internal emails re: Mazars issues (.2); proof of claim review and communications with D. Jones re: same (.3).	4.1	875.00	3,587.50



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Date	Timekeeper	Description	Hours	Rate	Fee
5/16/2022	JLW	Team call regarding status of discovery to third parties and document productions; update calendar with deadlines for third party document productions and depositions; receive and review email from D. Jones regarding same.	0.6	250.00	150.00
5/17/2022	DEJ	Attend meeting with E. Gilbert & H. Rosenblat, & A. Somers re points needed to prove Trustee's case	1	675.00	675.00
5/17/2022	AJS	Emails with Ashford re: Allen Guo deposition (.2); review documents and emails for meeting with J. Burns (.5); review K. Gould deposition transcript (.5); attend meeting with Morrison Cohen (1.0); review document and work on evidence for claims (1.2).	3.4	875.00	2,975.00
5/18/2022	AJS	Communications with M. Egan re: CIT documents and Ashford document and review documents re: same (.6); emails from N. Santucci re: fee applications (.1); review emails re: Ashford documents (.2); further work on EH authentication of document and Pan Dong Mei documents for deposition and communication re: same (.7); emails with M. Wang re: Chinese document (.1); review documents and work on claims (1.5).	3.2	875.00	2,800.00
5/19/2022	DEJ	Attend Jack Burns interview, draft and revise notes on same.	1	675.00	675.00
5/19/2022	AJS	Interview of J. Burns and review information post meeting for affidavit and post-meeting discussion call with M. Egon and work on start of affidavit (5.7); call with H. Rosenblatt re: global issues (.2).	5.9	875.00	5,162.50
5/20/2022	AJS	Communications re: A. Guo deposition (.2); communications re: J. Burns affidavit and review comments to same from J. Gross (.4).	0.6	875.00	525.00



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5/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
5/21/2022	JEG	Review trial affidavit and send comments to A. Somers.	0.7	875.00	612.50
5/23/2022	DEJ	Research imputation of knowledge (1.1); review and revise draft declaration of Jack Burns (0.5).	1.6	675.00	1,080.00
5/23/2022	AJS	Work on J. Burns affidavit and discuss with D. Jones and M. Egan (.9); review emails re: Mazars production (.2); emails with D. Amedeo re: scheduling and internal communications re: same (.2); review emails re: Danderline (.1); emails re: interview with A. Guo and follow up on same (1.1).	2.5	875.00	2,187.50
5/23/2022	JLW	Receive, review, and update production log regarding third party productions made in response to subpoenas; receive, review, and update calendar regarding potential deposition dates for Textile and Ross Auerbach.	0.6	250.00	150.00
5/24/2022	DEJ	Attend hearing on fee application and retention of expert issues (0.5), call with A. Somers re same (0.2)	0.7	675.00	472.50
5/24/2022	AJS	EH settlement issues (.3); communications with J. Litos and K. Aulet re: EH authenticating documents (.2); communications with M. Egan re: CIT production (.4); communication with expert re: requested documents and communications with M. Egan re: same (.6); prepare for and attend hearing re: retention of expert (1.1); work on claims and expert issues (1.0).	3.6	875.00	3,150.00
5/25/2022	DEJ	Call with A. Somers, M. Egan, & R. Quintero (2.0); Meeting with A. Somers, T. Klestadt, B. Bollinger (0.8); update chron and hot docs list with trial exhibits from claims against EH (3 0)	4.8	675.00	3,240.00



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**Invoice Date:**

7/8/2022

**Invoice No.:**

6941

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
5/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
5/25/2022	AJS	Work on timeline and narrative for case (3.3); work on CIT production issues (.5).	3.8	875.00	3,325.00
5/25/2022	JLW	Receive and review documents provided to R. Quintero; save same to file and prepare index; forward same to D. Jones.	0.9	250.00	225.00
5/26/2022	DEJ	Call with counsel to R. Danderline re subpoena (0.3)	0.3	675.00	202.50
5/26/2022	AJS	Work on A. Guo affidavit (.7); emails with Morris Cohen re: J. Burns affidavit; email with M. Egan re: board minutes (.3).	1	875.00	875.00
5/27/2022	AJS	Discussion of EH settlement with K. Aulet (.2); follow up for expert report (.5); emails re: CIT production; review documents and work on claims (1.6).	2.3	875.00	2,012.50
5/30/2022	AJS	Draft email re: issue to coordinate with Morrison Cohen and lay out of Trustee's case (1.3); emails re: CIT production and other emails re: production and depositions (.8).	2.1	875.00	1,837.50
5/31/2022	DEJ	Draft and revise search terms for CIT, calls and emails with A. Somers re same (0.6); review documents for stipulation by Pan Dong Mei, calls and emails with A. Somers re same (4.6)	5.2	675.00	3,510.00
5/31/2022	AJS	Numerous emails re: deposition schedule (.5); emails re: EH settlement (.3); emails re: CIT production; emails re: EH documents with D. Jones and follow up on documents; follow up on lack of board minutes documents (.2); begin to prepare for depositions with evidence by deponent and work on claims (2.6).	3.6	875.00	3,150.00
5/31/2022	JLW	Pull documents from database identified by A. Somers for preparation of Pan deposition; receive and review email from A. Somers regarding same.	2.2	250.00	550.00



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1301 S Capital of Texas Hwy  
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Fax: 512.647.6129

Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

7/8/2022

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5/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
TOTAL PROFESSIONAL FEES					72,760.00
REIMBURSABLE COSTS					
5/3/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
5/24/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
5/24/2022	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
TOTAL REIMBURSABLE COSTS:					210.00
INVOICE TOTAL					72,970.00

Invoice 6631 dated 6/14/2021	6,688.76
Invoice 6712 dated 8/16/2021	9,188.70
Invoice 6747 dated 10/8/2021	27,768.65
Invoice 6795 dated 12/2/2021	63,674.57
Invoice 6835 dated 1/25/2022	123,333.70
Invoice 6863 dated 3/10/2022	129,416.85
Invoice 6888 dated 4/27/2022	94,865.00
Invoice 6915 dated 6/8/2022	61,675.00

**Balance Due** \$589,581.23



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**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
6/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
6/1/2022	AJS	Conference call with R. Quintero re: report (.8); email with N. Santucci re: claims and follow up (.3); review emails with CIT re: search per document request (.4); email with T. Klestadt re: Ashford (.1); discuss expert request for documents via email with M. Egan (.8); conference call re: global strategy with co-professionals (1.3); follow up on information and legal issues pertinent to expert (.5).	4.2	875.00	3,675.00
6/1/2022	DEJ	Status conference and strategy session with R. Quintero (0.8); conference call re: global litigation strategy with co-counsel (1.3); draft and revise CIT search terms and emails with opposing counsel re: same (0.6)	2.7	675.00	1,822.50
6/2/2022	AJS	Review D. Amedeo email re: authenticity of documents and attachment (.3); establish dates and email with D. Amedeo re: deposition dates (.2); review Pan Dong Mei emails and more work on authentication (2.5).	3	875.00	2,625.00
6/2/2022	DEJ	Emails with opposing counsel re: CIT search terms	0.3	675.00	202.50
6/2/2022	JLW	Begin preparation of chart of 2017 emails for use at the deposition of Pan Dong Mei; telephone conference with A. Somers regarding same.	0.4	250.00	100.00
6/3/2022	AJS	Emails with M. Egan re: requests from expert for documents and follow up (.5); more work on authentication (.2); email with Allen Guo's counsel re: interview (.1); emails with B. Bollinger re: Bruns affidavit; work on claims (.9).	1.7	875.00	1,487.50



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Date	Timekeeper	Description	Hours	Rate	Fee
6/3/2022	JLW	Research database and pull documents in preparation for Pan Dong Mei's deposition; preparation of chart containing 2017 emails; receive and review email from A. Somers regarding same.	2.4	250.00	600.00
6/5/2022	DEJ	Emails with opposing counsel re: schedule for depositions and document productions	0.3	675.00	202.50
6/6/2022	AJS	Emails with M. Egan re: production documents from Ashford; multiple emails with M. Egan re: creditor claims (.6); call with K. Aulet re: authentication of documents (.2); review email from D. Jones re: requests for documents to Mazars (.1); email re: deposition of Clear Thinking (.2); review revisions to Affidavit for J. Burns (.6); organize PDM documents for deposition; review emails re: creditor claims (.3); work on claims (1.1).	3.1	875.00	2,712.50
6/6/2022	JLW	Research database regarding documents for use during upcoming depositions (.9); receive and review email from A. Somers regarding same (.2).	1.1	250.00	275.00
6/7/2022	AJS	Draft email of outline for global settlement and email to M. Egan re: same (1.6); emails re: Allen Guo deposition (.2); continue to work on PDM document and email with M. Egan re: same and prepare for deposition (2.9); email re: Allen Guo meeting (2).	4.9	875.00	4,287.50
6/7/2022	JLW	Attention to preparation for deposition of P. Dong.	0.3	250.00	75.00





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6/8/2022	AJS	Work on scheduling of depositions and emails re: same with adversary, witness counsel, reporting service and J. Wingerter (.8); conference call with expert re: report and follow up (.9); review CIT and other documents for motion to amend and work on same (1.2); revise and send global settlement email (.4); review and respond to email from client re: motion to amend and global settlement (.4); review email from D. Amedeo re: Mazars (.2); emails with D. Jones and M. Egan concerning motion to amend and work on motion (2.3); call with EH about scheduling and other issues (.2).	6.4	875.00	5,600.00
6/8/2022	DEJ	Status conference and strategy session with R. Quintero (0.8); review and revise motion to amend complaint and draft second amended complaint (2.1); Draft and revise motion for expedited hearing (3.0)	5.9	675.00	3,982.50
6/8/2022	JLW	Preparation of remote participation list for deposition of R. Auerbach (.3); locate Word version of motion to amend and forward same to A. Somers (.1).	0.4	250.00	100.00
6/9/2022	AJS	Email to client re: constructive fraud and work on motion to amend and emails with M. Egan and internally re: same and revise same (3.5); call with A. Guos's counsel, interview of A. Guos and follow up on same (1.6); review memorandum re: officer loans (.9); review emails re: information expert requested (.4).	6.4	875.00	5,600.00
6/9/2022	DEJ	Interview with Allen Guo and calls with A. Somers re same (1.5); review and revise motion for leave to amend complaint (1.3); review and revise motion for expedited hearing (0.8)	3.6	675.00	2,430.00



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Date	Timekeeper	Description	Hours	Rate	Fee
6/9/2022	JLW	Preparation of list of upcoming depositions, and forward same to team (.2); preparation of documents for the Pan Dong Mei deposition (1.1); preparation of notebook of documents for potential use at the deposition of Pan Don Mei deposition and forward same to A. Somers (3.4).	4.7	250.00	1,175.00
6/10/2022	AJS	Address issues with A. Guo interview with Morrison Cohen (.2); research subsequent transferee issues (.4); review Textile documents (1.1); call with K. Aulet re: authentication and email to same (.3).	2	875.00	1,750.00
6/10/2022	DEJ	Attention to motion for leave to amend complaint and expedited hearing and calls with A. Somers re same (2.1); attention to document production from Mazars (0.8)	2.9	675.00	1,957.50
6/10/2022	JLW	Continue preparation of documents for potential use at the deposition of Pan Dong Mei.	1.9	250.00	475.00
6/13/2022	AJS	Prepare for Pan Dong Mei deposition and email to Vertitex re: same and with D. Jones re: same and to adversary counsel re: authentication (5.3).	5.3	875.00	4,637.50
6/13/2022	DEJ	Meeting with R. Quintero & M. Egan re: Northwest financial distress; Calls with A. Somers re: same (1.0); review and revise stipulation on authenticity of documents (0.7)	1.7	675.00	1,147.50
6/14/2022	AJS	Prepare for and take Pan Dong Mei deposition (9.0).	9	875.00	7,875.00
6/14/2022	DEJ	Meeting with R. Quintero & M. Egan re: expert report (0.4); draft and revise stipulation of dismissal and notice re: attachment (2.4); Attend deposition of Pan Dong Mei (2.8)	5.6	675.00	3,780.00



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6/15/2022	AJS	Call with R. Quintero; work on expert report issues and follow up (.5); review CIT production issues; emails re: EH activity (.2); work on motion to amend and complaint (2.7); review documents for further deponents (.6).	4	875.00	3,500.00
6/15/2022	DEJ	Review and revise stipulation of dismissal and notice re: attachment and emails with opposing counsel re: same (1.3); document review re: earlier Extreme Horse transactions (3.3); revise second amended complaint (2.4)	7	675.00	4,725.00
6/15/2022	JLW	Finalize and file Notice of Release of Attachment in AP and Bankruptcy matters (.5); finalize and file Stipulation of Dismissal of Defendant Extreme Horse in AP and Bankruptcy matters (.5); receive, review, and save to file subpoena to Gao (.1).	1.1	250.00	275.00
6/16/2022	JEG	Revise motion to amend complaint.	0.5	875.00	437.50
6/16/2022	AJS	Emails with N. Santucci regarding creditor claims and follow up on same (.5); further work on motion to amend and review comments from J. Gross (2.8); communications with D. Jones re: form of request for shortened notice review same (.4); review documents for further deponents (.8); email to Y. Geron re: same and double check Statute of Limitations and amended complaints (.5).	5	875.00	4,375.00
6/16/2022	DEJ	Proofread and finalize motion for leave to amend and second amended complaint (2.6); coordinate filing and service of motion for leave to amend and second amended complaint and calls with A. Somers re: same (2.4); draft and revise expert disclosures (2.2)	7.2	675.00	4,860.00



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6/16/2022	JLW	Research bankruptcy docket and plan claim administrator's website regarding contact information for Claim Nos. 23, 32, 146, 170; receive and review email from A. Somers regarding same; research filing options for proposed order to show cause; receive and review email from D. Jones regarding same.	1.4	250.00	350.00
6/17/2022	AJS	Review M. Egan's timeline (.5); numerous emails and communications with M. Egan re: pertinent documents (.4); tend to expert witness issues (1.1); respond to chambers inquiry re: hearing date and follow up on filings regarding same (.3); review D. Jones emails regarding unreasonably small capital and related legal issues and review cases re: same; work with expert on scope of report and information available (1.6).	3.9	875.00	3,412.50
6/17/2022	DEJ	Review and revise expert disclosures (0.9); coordinate filing of order to show cause for expedited hearing (0.8); legal research re: standard for "unreasonably small capital" (1.2)	2.9	675.00	1,957.50
6/17/2022	JLW	Finalize and file motion for leave to amend complaint (.7); receive and review email from D. Jones and A. Somers regarding same (.2); upload show cause order to ECF (.2); review database and pull attachments to certain emails identified by A. Somers (.5); finalize and file motion for order to show cause for expedited hearing (.7); receive, review, and update calendar regarding order to show cause for expedited hearing (.3).	2.6	250.00	650.00
6/18/2022	AJS	Review documents on NW performance and prepare for deposition and numerous emails with M. Egan and D. Jones re: same (3.3); emails re: Mazar deposition (.2).	3.5	875.00	3,062.50



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6/18/2022	DEJ	Emails with A. Somers & M. Egan re: case management order and Deposition scheduling	1.3	675.00	877.50
6/19/2022	AJS	Prepare for Textile/Ross Auerbach deposition (.7); emails with J. Gross re: asset disclosure (.1) and communications with M. Egan re: deposition (.3).	1.1	875.00	962.50
6/20/2022	AJS	Review documents and prepare for Textile/Ross Auerbach deposition (5.3); emails with M. Egan re: expert report and review documents attached (.9); review draft disclosure comments (.1); communications with expert and follow up (1.1); email to counsel for Textile re: Jolson deposition (.1); follow up with D. Jones re: Auerbach's response to RFPs (.2); discuss expert interview with M. Egan and communication with counsel for J. Burns and A. Guo re: expert interview (.5); email re: CIT deposition with D. Jones (.1); review notices of deposition (.2).	8.5	875.00	7,437.50
6/20/2022	DEJ	Meeting with counsel for Jack Burns & Allen Guo re: interviews and follow up (1.0); draft and revise deposition notices (0.9); attention to document productions and RFPs to R. Auerbach (0.6)	2.5	675.00	1,687.50
6/21/2022	AJS	Review documents prepare for Textile/Ross Auerbach deposition and communications with M. Egan and D. Jones re: same (6.6); communications with M. Egan re: expert report and follow up on same (.3); review numerous emails re: scheduling depositions (.4); review email re: CIT production (.1); communications re: rearranging for remote deposition per Textile request (.3).	7.7	875.00	6,737.50
6/21/2022	JLW	Attention to preparation of documents for the depositions of Ross Auerbach and Textile's corporate representative.	6.9	250.00	1,725.00



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6/22/2022	AJS	Review documents prepare for Textile/Ross Auerbach deposition (5.9); follow up on R. Jolson deposition (.3); review emails re: expert interview (.2); Communications with Morrison Cohen re: scope of deposition (.5); follow up on transcript quality and depositions scheduling with Veritext (.3); review communications re: Danderline deposition (.2); review materials sent to expert by interview party (.2).	7.6	875.00	6,650.00
6/22/2022	JLW	Attention to preparation for deposition of Ross Auerbach.	0.6	250.00	150.00
6/23/2022	AJS	Emails re: interview from expert (.1); prepare for Auerbach deposition (4.7); numerous communications with M. Egan re: same (.9); emails with D. Jones re: CIT search teams (.4) review objection to motion to amend and prepare to reply (1.3).	7.4	875.00	6,475.00
6/23/2022	DEJ	Emails with A. Somers re: CIT search terms	0.4	675.00	270.00
6/24/2022	AJS	Prepare for and take Textile/Ross Auerbach deposition (5.8); review email from client and send update (.1); draft reply (4.7).	10.6	875.00	9,275.00
6/24/2022	JLW	Receive, review, and save to file Northwest Textile's objection to motion for leave to file second amended complaint (.2); receive, review, and save to file Trustee's motion for approval of settlement agreement resolving claims against Allen Guo (.2).	0.4	250.00	100.00



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6/27/2022	AJS	Prepare for and attend hearing on motion to amend and follow up (1.6); call with client and others regarding status of case and settlement strategy and follow up (.5); work on expert report and emails with M. Egan, expert, and D. Jones re: same (5.7); write list of to do items for deposition schedule and compliance with productions (.6); review numerous emails from Veritext and internally re: depositions schedule and emails with adversary counsel and Textile counsel re: same (.8); draft email to revised scope of what we have to prove in light of Judge granting motion to amend (.2); review emails from D. Jones re: research of legal topics (.3); review and revise order re: leave to amend and revised complaint (.6).	10.3	875.00	9,012.50
6/27/2022	DEJ	Attend hearing on motion for leave to file amended complaint and calls with A. Somers re: same (0.5); meeting with Trustee re: amended complaint (0.4); calls with creditors re: depositions and factual research re: same (2.1); legal research re: DCL 275 standards (2.9); revise SAC pursuant to comments from J. Wiles (1.7)	7.6	675.00	5,130.00
6/27/2022	JLW	Pull certain proofs of claim for Kunshan Heiwei, Suzhou Megatex Import; Flyone International Trading, and Sapona Plastics, and forward same to D. Jones (.4); pull all transcripts taken to date, and save same to file (.2); receive, review, save to file, and update calendar regarding Marchese deposition subpoena (.2).	0.8	250.00	200.00



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6/28/2022	AJS	Work on review of expert report and numerous emails to M. Egan and expert re: same (7.3); review remails re: creditor depositions (.2); review Textile's comments to draft order (.2); review emails from D. Jones re: research of legal topics (.3); review emails from counsel to CIT re: document request; prepare for and attend call with counsel to CIT (.3); review emails re: deposition scheduling (.4).	8.7	875.00	7,612.50
6/28/2022	DEJ	Legal research re "maturity" of debts & relevant transfer date under NYDCL (2.7); coordinate filing of second amended complaint with opposing counsel (0.8); draft and revise deposition notices, calls with A. Somers re: same (3.4); review document production from R. Danderline (3.8)	10.7	675.00	7,222.50
6/28/2022	JLW	Receive, review, save to scan, and update calendar regarding notices and subpoenas to CIT, Georgis, Jolson, Kremberg, and Sapona (1.0); email to court reporter scheduling same (.2).	1.2	250.00	300.00
6/29/2022	AJS	Work on review of expert report and numerous emails to M. Egan and D. Jones and expert re: same (9.2); review numerous emails from D. Jones re: depositions and send emails re: same (.7); review expert report of Textile (.4).	10.3	875.00	9,012.50
6/29/2022	DEJ	Attention to expert disclosures, calls with A. Somers re: same (6.5); legal research re: standard for liability of subsequent transferees (2.6)	9.1	675.00	6,142.50
6/29/2022	JLW	Email to court reporter regarding change in date of deposition of R. Jolson (.1); email to court reporter scheduling the deposition of T. Georgis (.1); update calendar regarding same (.1).	0.3	250.00	75.00



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Billing Through	Due Date:	Our File #
6/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
6/30/2022	AJS	Review numerous emails from D. Jones re: depositions and send emails re: same (1.1); prepare for future depositions of numerous parties (3.5).	4.6	875.00	4,025.00
6/30/2022	DEJ	Draft and revise additional deposition notices, calls with A. Somers re: same (2.6); draft and revise amended initial disclosures (2.4)	5	675.00	3,375.00
6/30/2022	JLW	Receive, review, and save to file the Court's order granting motion for leave to file second amended complaint (.1); finalize and file second amended complaint (.5); receive, review, and update calendar regarding Trustee's notice and subpoena to take depositions of Danderline and Burns (.3); receive, review, and update calendar regarding Textile's notice and subpoena to take deposition of Lellos (.2).	1.1	250.00	275.00
Subtotal Professional Fees					180,910.00
REIMBURSABLE COSTS					
6/16/2022	AJS	FedEx Inv 7-789-40137 TID 777085795281: package to A. Somers on 6.9.2022		70.71	70.71
6/23/2022	AJS	6.14.2022 Veritext Inv 5847627: Translation: Witness: Pan Dong Mei		2,000.00	2,000.00
6/27/2022	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
6/27/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
6/27/2022	AJS	6.14.2022 Veritext Inv 5868462 Original with 1 Certified Transcript: Witness: Pan Dong Mei		1,935.16	1,935.16
6/28/2022	AJS	6.23.2022 Veritext Inv 5873220 Video Services: Witness: Ross Auerbach		3,355.00	3,355.00



**Please Remit to:**  
**Reid Collins & Tsai LLP**  
**1301 S Capital of Texas Hwy**  
**Building C, Suite 300**  
**Austin, Texas 78746**  
**Main: 512.647.6100**  
**Fax: 512.647.6129**

Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

8/10/2022

**Invoice No.:**

6955

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
6/30/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
6/30/2022	AJS	FedEx Inv 7-804-87433 TID 777191142224 - shipment from J. Wingerter to A. Somers on 6.21.2022		268.22	268.22
6/30/2022	DEJ	6.28.2022 USPS		0.53	0.53
TOTAL REIMBURSABLE COSTS:					7,769.62

INVOICE TOTAL 188,679.62

Invoice 6631 dated 6/14/2021	6,688.76
Invoice 6712 dated 8/16/2021	9,188.70
Invoice 6747 dated 10/8/2021	27,768.65
Invoice 6795 dated 12/2/2021	63,674.57
Invoice 6835 dated 1/25/2022	123,333.70
Invoice 6863 dated 3/10/2022	129,416.85
Invoice 6888 dated 4/27/2022	94,865.00
Invoice 6915 dated 6/8/2022	61,675.00
Invoice 6941 dated 7/8/2022	72,970.00

**Balance Due \$ 778,260.85**



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**Invoice Date:**

8/25/2022

**Invoice No.:**

6964

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
7/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
7/1/2022	AJS	Communications with M. Egan re: rebuttal report (.3); communications with D. Jones and M. Egan re: CIT production; communications with D. Jones re: depositions (.2); communications with D. Jones and M. Egan re: Rivkin (.3); email with D. Jones re: ordinary course issues and law and review Textile's expert report and further emails regarding same (2.5); review documents and work on claims (1.6).	4.9	875.00	4,287.50
7/1/2022	DEJ	Draft and revise amended subpoenas for J. Burns (0.2); Call with A. Somers re: same (0.1); attention to document production from R. Danderline (0.4); legal research re: ordinary course in context of DCL Section 275 claim and communications with A. Somers re: depositions and proof of same (3.1).	3.8	675.00	2,565.00
7/1/2022	JLW	Receive, review, and update calendar regarding change in start time for the deposition of J. Burns (0.1); email to court reporter regarding same (0.1).	0.2	250.00	50.00
7/4/2022	AJS	Emails with M. Egan re: inability to pay debts and Mazars (.3); communications with counsel from CIT re: confidentiality protocol and with D. Jones re: same and review related documents (1.2); email with J. Wingerter and D. Jones re: depositions (.2); review Ashford documents and email to M. Egan re: same and scheduling of same (.3); email re: CTG documents; communications with D. Jones re: Danderline depositions topics (.5); work on claims (1.3).	3.8	875.00	3,325.00



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7/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/5/2022	AJS	Draft email to expert re: CIT credit memorandum and analysis of CIT documents (2.3); draft long email re: proving our case to M. Egan and D. Jones and follow up (1.5); communication with expert re: rebuttal report and follow up (.9).	4.7	875.00	4,112.50
7/5/2022	DEJ	Legal research re: good faith requirement for subsequent transferee and draft and revise summary of same (4.5); Calls with A. Somers (0.3); attention to third party subpoenas to creditors (1.5); draft and revise stipulation re: use of creditors' testimony and communications with A. Somers re: same (1.9).	8.2	675.00	5,535.00
7/6/2022	AJS	Review issues re: rebuttal report and communications with D. Jones and M. Egan re: same; and work on claims related to same (3.7).	3.7	875.00	3,237.50
7/6/2022	DEJ	Phone call with counsel for T. Georgis (0.4); Calls and emails with A. Somers re: expert depositions (0.3); attention to service of amended initial disclosures (0.3); review of prepaid inventory schedules and emails with A. Somers and M. Egan re: same (1.1); draft and revise second requests for production to Textile (0.9).	3	675.00	2,025.00
7/7/2022	AJS	Communications with D. Jones and M. Egan re: Mazars and Gould deposition and follow up (1.2); draft email to Heath re: assessment of adversary case (.6); emails with D. Jones re: Textile assets and follow up on same (.5); review Textile asset inquiry request (.3); email with H. Rosenblatt re: negotiations and offers (.5); review emails re: deposition scheduling (.6); work on expert report issues (.9); work on claims (1.1).	5.7	875.00	4,987.50



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7/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/7/2022	DEJ	Emails with M. Egan re: Mazars corporate representative and calls with A. Somers re: same (0.7); draft and revise second requests for production to Textile and communications with A. Somers re: same (0.6); review documents to determine best witness from Mazars (1.8); attention to deposition schedules and emails re: same (0.6).	3.7	675.00	2,497.50
7/8/2022	AJS	Work on expert report issues (2.6); communications with D. Jones re: trade creditor and proof and depositions (.8); communications with CIT counsel re: deposition; review documents and work on claims and communications with M. Egan re: same (1.7).	5.1	875.00	4,462.50
7/8/2022	DEJ	Review and revise second requests for production to Textile (0.8); Emails with A. Somers & M. Egan re: expert report and calls with A. Somers re: same (0.7); attention to stipulate re: use of creditor testimony (0.5); finalize and serve second requests for production to Textile (0.6).	2.6	675.00	1,755.00
7/10/2022	AJS	Email to M. Egan and D. Jones re: admissions (.5).	0.5	875.00	437.50
7/11/2022	AJS	Emails with D. Jones re: creditor testimony and depositions (.3); draft email re: mediation offers for future possible settlement talks, and communications with D. Jones and M. Egan re: same and follow up on same with client (1.7); review emails re: CIT production (.2); review document re: Rivkin production (.2).	2.4	875.00	2,100.00



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7/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/11/2022	DEJ	Review CIT search terms and scope of CIT production, calls with A. Somers re: same (2.5); legal research re: subpoenas to parties in China (1.1); draft and revise production deficiency notice to CIT, calls with A. Somers re: same (1.7); attention to third party subpoenas and deposition schedule (0.4); legal research re: service of subpoena by mail (1.7).	7.4	675.00	4,995.00
7/12/2022	AJS	Review emails re: creditor deposition and stipulation review numerous communications with D. Jones re: same and Kremberg depositions (.7); review Georgi's notes for call and add to them re: interview and follow up (.5); communication regarding interview with Mazars communications with CIT re: deposition (.1); review documents and work on claims (.8).	2.1	875.00	1,837.50
7/12/2022	DEJ	Attention to third party subpoenas and deposition schedule, calls with A. Somers re: same (1.6); draft and serve amended third party subpoenas for J. Kremberg and C. Grieco (0.6).	2.2	675.00	1,485.00
7/12/2022	JLW	Receive, review, and update calendar regarding amended deposition subpoena to CIT Group (0.1); contact court reporter regarding same (0.1); receive, review, and update calendar regarding deposition subpoena to Suzhou Megatex Import (0.1); contact court reporter regarding same (0.1).	0.4	250.00	100.00
7/13/2022	AJS	Interview with T. Georgis and follow up (0.4) and call with D. Jones (0.2).	0.6	875.00	525.00
7/13/2022	DEJ	Interview with T. Georgis, notes and follow up re: same (0.5); call with counsel for R. Danderline, calls with A. Somers re: same (0.6); emails with Mazars, Flyone, and counsel re: depositions and interviews (0.4).	1.5	675.00	1,012.50



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Date	Timekeeper	Description	Hours	Rate	Fee
7/13/2022	JLW	Receive, review, and download the deposition exhibits of R. Auerbach to file (0.3); preparation of index of deposition exhibits (3.9).	4.2	250.00	1,050.00
7/14/2022	DEJ	Attention to third party deposition subpoenas (1.6); draft and revise deposition outline for creditors (2.3).	3.9	675.00	2,632.50
7/14/2022	JLW	Continue preparation of index of deposition exhibits.	2.1	250.00	525.00
7/15/2022	AJS	Emails with Y. Geron re: settlement and merits of adversary; arrange for deposition of witness and others (.3); review email re: follow up Ross Auerbach production (.2).	0.5	875.00	437.50
7/15/2022	DEJ	Emails with counsel for R. Danderline re: document productions and deposition (0.3); draft and revise deposition outlines for creditors (3.9).	4.2	675.00	2,835.00
7/15/2022	JLW	Receive, review, and save to file deposition subpoena of Flyone International (0.1); update calendar regarding same (1.1); email to court reporter scheduling the deposition of Flyone International's representative (0.2).	0.4	250.00	100.00
7/16/2022	AJS	Review and work on expert report (3.9).	3.9	875.00	3,412.50
7/17/2022	AJS	Review emails re: depositions (.2); work on expert report and communications with M. Egan, D. Jones, and R. Quintero expert re: same (4.5).	4.7	875.00	4,112.50
7/17/2022	DEJ	Call with A. Somers re: expert rebuttal report (0.4); conference call with A. Somers, M. Egan, and R. Quintero re: expert rebuttal report (1.5).	1.9	675.00	1,282.50



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7/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/18/2022	AJS	Call re: report and review updated report and comments on same and numerous communications with M. Egan and D. Jones and expert re: same (6.7); email re: CIT deposition (.1).	6.8	875.00	5,950.00
7/18/2022	DEJ	Conference call with A. Somers, M. Egan, and R. Quintero re: rebuttal expert report, edit expert report per call (0.6); attention to witness interviews and third party deposition subpoenas, call with A. Somers re: same (0.4); emails with counsel for CIT & Textile re: document production deficiencies (0.5).	1.5	675.00	1,012.50
7/19/2022	AJS	Call re: report and review updated report and comments on same and numerous communications with M. Egan and D. Jones and expert re: same (4.9).	4.9	875.00	4,287.50
7/19/2022	DEJ	Attend meeting with R. Quintero, J. Burns & counsel (0.7); attention to third party deposition subpoenas, call with A. Somers re: same (1.1).	1.8	675.00	1,215.00
7/20/2022	AJS	Review emails re: depositions (.4).	0.4	875.00	350.00
7/20/2022	DEJ	Coordinate deposition dates for third party and expert witnesses with opposing counsel (0.7); draft and revise deposition outline for creditors (3.0).	3.7	675.00	2,497.50
7/20/2022	JLW	Draft and revise remote participant list for Sapona Plastics deposition and forward same to D. Jones to review (.10); forward same to court reporter (.10); update calendar with depositions of M. Schwartz and R. Quintero (.30); email to court reporting regarding same (.10).	0.6	250.00	150.00
7/21/2022	AJS	Review emails re: deposition and expert reports (.3); review email re: CIT production (.1).	0.4	875.00	350.00



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7/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/21/2022	DEJ	Emails with opposing counsel re: third party depositions.	0.3	675.00	202.50
7/21/2022	JLW	Receive, review, and save to file Defendant's Answer and Cross-Claims (.10); update calendar regarding deadline to answer cross-claims (.10).	0.2	250.00	50.00
7/22/2022	DEJ	Proofread and serve rebuttal expert report, calls with R. Quintero re: same.	3.7	675.00	2,497.50
7/22/2022	JLW	Receive and compare Defendant's answer to second amended complaint to Defendant's answer to first complaint and forward same to team (.30); update calendar regarding confirmation of Suzhou Megatex Import deposition (.10); email to court reporter regarding scheduling same (.10).	0.5	250.00	125.00
7/25/2022	AJS	Review emails with D. Jones re: deposition and cross noticing parties and scope and CIT production (.5); communication with Y. Geron re: settlement and follow up with Morrison Cohen and review numerous emails re: cancellation of depositions re: same (1.5).	2	875.00	1,750.00
7/25/2022	DEJ	Emails with opposing counsel re: deficient document production from CIT, call with A. Somers re: same (0.5); Call with Trustee re: settlement discussions (0.4); coordinate to cancel/postpone depositions and document productions (1.3).	2.2	675.00	1,485.00



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7/31/2022		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
7/25/2022	JLW	Preparation of remote participant list for the deposition of Flyone International Trading, and receive email from D. Jones regarding same (.10); email to D. Jones regarding the depositions of Guo and Georgis (.10); preparation of remote participant list for the deposition of T. Georgis, and forward same to court reporter (.20); receive and review email from D. Jones and update deposition calendar regarding same (.20)	0.6	250.00	150.00
7/26/2022	AJS	Review numerous emails re: cancellation of depositions re: same (1.5).	1.5	875.00	1,312.50
7/29/2022	DEJ	Emails and call with A. Somers re: stay of deadlines and Textile's position.	0.9	675.00	607.50
		Subtotal Professional Fees			91,712.50
		REIMBURSABLE COSTS			
7/13/2022	AJS	6.24.2022 Veritext Inv 5902440 Video Services: Witness: Ross Auerbach		1,602.50	1,602.50
7/16/2022	DEJ	Preemptive Process Servers Inv 071122-202 - Service upon Marc Helleer, New York, NY		275.00	275.00
7/19/2022	AJS	6.23.2022 Veritext Inv 5910395 Original with 1 Certified Transcript: Witness: Ross Auerbach		4,373.70	4,373.70
		TOTAL REIMBURSABLE COSTS:			6,251.20

INVOICE TOTAL 97,963.70

Invoice 6631 dated 6/14/2021 6,688.76  
Invoice 6712 dated 8/16/2021 9,188.70  
Invoice 6747 dated 10/8/2021 27,768.65  
Invoice 6795 dated 12/2/2021 63,674.57  
Invoice 6835 dated 1/25/2022 123,333.70  
Invoice 6863 dated 3/10/2022 129,416.85  
Invoice 6888 dated 4/27/2022 94,865.00  
Invoice 6915 dated 6/8/2022 61,675.00  
Invoice 6941 dated 7/8/2022 72,970.00  
Invoice 6955 dated 8/10/2022 188,679.62

**Balance Due**

\$876,224.55



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4/26/2023

**Invoice No.:**

7087

**RE: Adversary Proceeding**

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4/26/2023		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
PROFESSIONAL FEES					
8/1/2022	DEJ	Emails with A. Somers & CIT's counsel re: document discovery	0.5	675.00	337.50
8/1/2022	AJS	Emails and call with S. Gable and D. Jones and other wrap up matter related to settlement (1.1).	1.1	875.00	962.50
8/3/2022	DEJ	Emails and phone calls with A. Somers re: Auerbach settlement & stay of discovery	0.9	675.00	607.50
8/3/2022	AJS	Work on settlement and rearranging litigation schedule re: same and respond to T. Klestadt email re: trustee handling settlement (.8).	0.8	875.00	700.00
8/4/2022	DEJ	Emails with third party counsel re: potential settlement and stay of discovery	0.3	675.00	202.50
8/4/2022	AJS	Review settlement terms and work on settlement and terms of EH settlement and emails regarding same and call regarding same with co-counsel and client (.7).	0.7	875.00	612.50
8/5/2022	DEJ	Call with Court re: scheduling hearing for stay of discovery (0.2); emails with A. Somers & opposing counsel re: same	0.3	675.00	202.50
8/5/2022	AJS	Email re: settlement with M. Egan and re: expert ceasing work (.1); emails regarding status conference and settlement with Y. Geron and H. Rosenblatt (.3); review emails of H. Rosenblatt regarding settlement; request conference from court by email (and re-arrange same re: court request (.3).(9).	0.7	875.00	612.50



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Date	Timekeeper	Description	Hours	Rate	Fee
8/5/2022	JLW	Email to court reporter regarding cancellation of upcoming depositions (.10); update calendar regarding same (.20); update calendar regarding status conference with the court (.10).	0.4	250.00	100.00
8/6/2022	DEJ	Review draft settlement agreement & provide comments on same	1	675.00	675.00
8/6/2022	AJS	Comment on settlement agreement and review email from D. Jones re: same (.6).	0.6	875.00	525.00
8/7/2022	DEJ	Call with A. Somers re: settlement agreement edits	0.2	675.00	135.00
8/7/2022	AJS	Review email from H. Rosenblatt and revised settlement agreement (.3).	0.3	875.00	262.50
8/8/2022	AJS	Send email re: settlement agreement to H. Rosenblatt and email with M. Egan re: same and adjournment of depositions re: same (.8); email with client re: status conference (.1).	0.9	875.00	787.50
8/8/2022	JLW	Sign-up A. Somers and D. Jones to Court Solutions for status conference.	0.2	250.00	50.00
8/10/2022	DEJ	Attend status conference (0.3); draft and revise proposed order, emails with A. Somers & opposing counsel re: same (0.6)	0.9	675.00	607.50
8/10/2022	AJS	Attend hearing for Northwest and follow up emails re: same and proposed order re: same and respond to email of K. Aulet re: trustee handling settlement (1.5).	1.5	875.00	1,312.50



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Tax ID No. 27-1333576

**Bill To:**

Yann Geron, Chapter 7 Trustee of  
The Northwest Company LLC et al.  
Geron Legal Advisors  
370 Lexington Avenue, Suite 1101  
New York, NY 10017

**Invoice Date:**

4/26/2023

**Invoice No.:**

7087

**RE: Adversary Proceeding**

Billing Through	Due Date:	Our File #
4/26/2023		3024.002

Date	Timekeeper	Description	Hours	Rate	Fee
8/10/2022	JLW	Receive, review, and update calendar regarding order adjourning pretrial conference and end of discovery deadline (.20); update Court Solutions with new pretrial conference setting (.10).	0.3	250.00	75.00
8/12/2022	AJS	Work on settlement agreement and rearrange litigation schedule re: same (.5).	0.5	875.00	437.50
8/30/2022	AJS	Work on extension with new order and hearing and email to court and emails with client re: same and to adversary re: same (2.1).	2.1	875.00	1,837.50
9/15/2022	AJS	Emails regarding settlement (.1).	0.1	875.00	87.50
9/16/2022	AJS	Work on stay and bankruptcy issues (2.8).	2.8	875.00	2,450.00
9/20/2022	AJS	Emails to Heath Rosenblatt regarding settlement; and emails to adversary re: adjournment of discovery deadlines and to Judge Wiles regarding same (1.1).	1.1	875.00	962.50
9/21/2022	AJS	Draft order and coordinate with Judge Wiles chambers regarding same (.8).	0.8	875.00	700.00
9/21/2022	JLW	Receive, review, save to file, and update calendar regarding order adjourning discovery deadlines an additional three weeks.	0.2	250.00	50.00
9/28/2022	AJS	Email with T. Klestadt re: settlement (.1).	0.1	875.00	87.50
10/11/2022	AJS	Review deadline and emails re: settlement (.2).	0.2	875.00	175.00
10/20/2022	AJS	Email re: settlement and adjournment of dates for litigation (.3).	0.3	875.00	262.50

**Please Remit to:**  
**Reid Collins & Tsai LLP**  
**1301 S Capital of Texas Hwy**  
**Building C, Suite 300**  
**Austin, Texas 78746**  
**Main: 512.647.6100**  
**Fax: 512.647.6129**

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Date	Timekeeper	Description	Hours	Rate	Fee
10/24/2022	AJS	Emails with client and Morrison Cohen and Update on settlement and work on adjournment of litigation deadlines with order, and email to chambers (1.8).	1.8	875.00	1,575.00
11/7/2022	AJS	Emails and order re: extension of time to Court (.9).	0.9	875.00	787.50
11/8/2022	AJS	Address settlement issues (.1).	0.1	875.00	87.50
12/12/2022	AJS	Email to Y. Geron re: status conference update (.2).	0.2	875.00	175.00
12/29/2022	AJS	Work on fee application issues (.5).	0.5	875.00	437.50
1/19/2023	AJS	Review emails from T. Klestadt and H. Rosenblatt (.2).	0.2	875.00	175.00
2/3/2023	AJS	Review email re: settlement (.1).	0.1	875.00	87.50
TOTAL PROFESSIONAL FEES					19,142.50
REIMBURSABLE COSTS					
8/5/2022	AJS	6.24.2022 Veritext Inv 5954764 Original with 1 Certified Transcript: Witness: Ross Auerbach		3,452.89	3,452.89
8/10/2022	AJS	Court Solutions - Teleconference: A. Somers		70.00	70.00
8/10/2022	DEJ	Court Solutions - Teleconference: D. Jones		70.00	70.00
11/9/2022	AJS	Court Solutions - Teleconference: A. Somers		50.00	50.00
TOTAL REIMBURSABLE COSTS:					3,642.89

# reid | collins

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INVOICE TOTAL: 22,785.39

Invoice 6631 dated 6/14/2021: 6,688.76  
 Invoice 6712 dated 8/16/2021: 9,188.70  
 Invoice 6747 dated 10/8/2021: 27,768.65  
 Invoice 6795 dated 12/2/2021: 63,674.57  
 Invoice 6835 dated 1/25/2022: 123,333.70  
 Invoice 6863 dated 3/10/2022: 129,416.85  
 Invoice 6888 dated 4/27/2022: 94,865.00  
 Invoice 6915 dated 6/8/2022: 61,675.00  
 Invoice 6941 dated 7/8/2022: 72,970.00  
 Invoice 6955 dated 8/10/2022: 188,679.62  
 Invoice 6964 dated 8/25/2022: 97,963.70

**BALANCE DUE** \$899,009.94

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE NORTHWEST COMPANY, LLC, *et al.*<sup>1</sup>  
Debtors.

Chapter 7

Case No. 20-10990 (MEW)

(Jointly Administered)

**FINAL CERTIFICATION OF ANGELA J. SOMERS**

Angela J. Somers declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of the firm of Reid Collins & Tsai LLP (“Reid Collins”)

Reid Collins serves as special counsel to Yann Geron as Chapter 7 Trustee of The Northwest Company LLC (“NW”). In compliance with the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases, adopted January 29, 2013 (the “Local Guidelines”), and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted May 17, 1996 (the “U.S. Trustee Guidelines”) and together with the Local Guidelines (the “Guidelines”), I hereby certify as follows.

2. I have reviewed the *Final Application of Reid Collins & Tsai LLP, as Special Counsel to Trustee in Connection with Adversary Case, for Allowance of Compensation for Services and Reimbursement of Expenses for the period of May 1, 2021 through April 26, 2023* (the “Application”), which seeks final approval and payment of certain legal fees for services rendered by Reid Collins to the Trustee and reimbursement of certain expenses incurred in connection with the above-captioned Chapter 11 Case.

3. As required by Section B.1 of the Local Guidelines, I certify that:

(a) I have read the Application;

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<sup>1</sup> The Debtors in these Chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number, are: The Northwest Company, LLC (8132) and The Northwest.com LLC (1339).



- (b) To the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought in the Application fall within the Local Guidelines;
- (c) The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by Reid Collins and are generally accepted by Reid Collins' clients; and
- (d) In providing reimbursable services, Reid Collins does not make a profit on such service, whether the service is performed by Reid Collins in-house or through a third party.

4. In respect of Section B.3 of the Local Guidelines, I certify that copies of the Application are being provided to (i) the Office of the United States Trustee, and (ii) prior to a hearing, will be provided to those parties who have filed a notice of appearance and request for service of pleadings in this case pursuant to Bankruptcy Rule 2002.

5. In accordance with Federal Rule of Bankruptcy Procedure 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between me, my firm or any attorney thereof, on the one hand, and any other person, on the other hand, for the division of such compensation as my firm may receive from the Debtors herein, nor will any division of fees prohibited by section 504 of the Bankruptcy Code be made by me, or any attorney of my firm.

I certify, under penalty of perjury, that the foregoing statements made by me are true and correct, to the best of my knowledge, information, and belief.

Dated: June 6, 2023

/s/ Angela J. Somers  
Angela J. Somers